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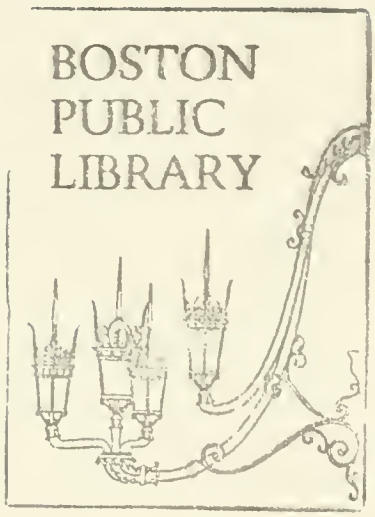
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CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	: Fan Pier/Pier 4 Developments
PROJECT LOCATION	: South Boston
EOEA NUMBER	: 4426/4584
PROJECT PROPONENT	: HBC Associates/The Boston Mariner Co.
DATE NOTICED IN MONITOR	: December 24, 1985

The Secretary of Environmental Affairs herein issues a statement that the Draft Environmental Impact Report submitted on the above project adequately and properly complies with the Massachusetts Environmental Policy Act (G.L., c.30, s.62-62H) and with its implementing regulations (301 CMR 10.00).

OVERVIEW

Boston Harbor is the premier natural resource of urban eastern Massachusetts. Historically, it fostered the foundation of the City, sponsored its growth as a maritime shipping center, supported it as an industrial and fishing center, witnessed the decline of these traditional uses, and, more recently, hosted a dramatic rebirth of mixed waterfront uses. It is a goal of both the City of Boston and the Commonwealth to encourage this renaissance, to support it through appropriate public investments, and, most important , to assure that new development on the waterfront serves the public and respects those public rights of access and use so important to the future of Boston Harbor.

Although the goal of encouraging the Boston Harbor renaissance is an accepted one, the goal of MEPA and the Secretary is to assure that development takes place within an appropriate context. Traditionally, MEPA examines context in terms of environmental impacts and mitigation; section 61 of MEPA requires agencies granting permits and licenses to do so only if convinced that the impacts are in fact mitigated. But since the revision of chapter 91 of the General Laws, MEPA's role has been expanded as the tidelands permit issued by DEQE requires examination of public purpose, public benefit versus detriment, and consistency with the Massachusetts Coastal Zone Management plan. Therefore, it is appropriate for MEPA review of projects requiring chapter 91 licenses to include discussion of fit within the community; of the uses to which a project will be put; of the impact of a project on future uses of the harbor; of the extent of public amenities which will compensate the Commonwealth for relinquishing public rights in tidelands, including visual access, parks, and public access; and of the impacts of the project on future developments.

Before me now is one of the most important new waterfront projects in the recent history of the City. Fan Pier and Pier 4 were a part of the original industrial, water transport, and rail transport use mix that dominated the north shore of South Boston for over a hundred years. To the west, across Fort Point Channel, is the Financial District, with dense commercial development, excellent transit access, high rise construction, and high levels of pedestrian activity. To the south is the Fort Point Channel District, now being converted to offices, residential uses, museums, an artists' colony, and open space. To the east is Commonwealth Pier, the Fish Pier, and the Boston Marine Industrial Park, with low structures, industrial uses, and heavy reliance on truck access for the movement of goods. Further to the south and east is residential South Boston, a vibrant mix of residential, local commercial, and open space uses. It is at this nexus and in this changing environment that the Fan Pier/Pier 4 development proposes to locate.

The Fan Pier/Pier 4 project represents a major expansion of Financial District uses across the Fort Point Channel into South Boston. It will serve as nucleus and stimulant for other major developments, such as the World Trade Center and the Cabot, Cabot & Forbes site, and will determine the character and use of this part of the City into the twenty first century. The task before

the developers, begun in the Draft EIR, is to propose a concept for this use and to explore the significance of this change for the urban environment. The task of the many reviewing bodies, begun during the preparation of the Draft EIR and continuing, is to assure that the final project meets, as far as possible, the many goals and satisfies, as well as possible, the many needs inherent in this special location. The following paragraphs detail the review of the Draft EIR, the concerns that have been raised by that review, and a process for the resolution of those concerns.

THE DRAFT ENVIRONMENTAL IMPACT REPORT

The Draft EIR prepared for this project goes well beyond both the breadth of coverage and the depth of detail that is customary in EIRs. By presenting a complete coverage of all planned and potential development in this part of the South End, it provides a truly useful planning document to guide those decisions that must be made by the proponents and public decision makers in the coming months. By developing a lesser scale alternative that responds to some of the goals expressed in early review, it evidences the proponents' commitment to a project that both meets their legitimate business aims and respects the public's legitimate rights in the waterfront. By proposing several creative and thoughtful mitigation measures, it sets the stage for a successful private/public partnership to provide those transportation and infrastructure improvements necessary to support this and other proposed developments in South Boston while limiting the negative effects on the South Boston residential community and the remainder of Boston. The proponents and their consultants are to be commended for the Draft EIR and for their support of informed public review in the best spirit of the Massachusetts Environmental Policy Act.

The high quality of the Draft EIR and the high quality of public and agency review of the project are clearly demonstrated in the volume, quality, and usefulness of the comments received on the Draft EIR. All reviewers, and most particularly the Fan Pier/Pier 4 Citizens Advisory Committee and the Executive Office of Transportation and Construction, have invested time, effort, and thought in their review of the document and in their comments to me. The comments, in fact, are of such detail that any technical comments by my office would be redundant. Suffice it to say that the proponents face a challenge in responding to the

comments attached, each of which must be dealt with fully in the Final EIR. The remainder of my comments serve to highlight the concerns expressed in the comments and my review of the Draft EIR and to suggest a process for resolving these concerns and reporting on them in the Final EIR.

THE CONCERNS

Not surprisingly, the Draft EIR reveals that the proposed projects will seriously overtax the existing transportation and infrastructure systems serving South Boston. The proposed projects, when combined with all other proposed development in the area, will also stress the systems which may be in place by 1995. The Draft EIR also demonstrates that, while much improved as compared to the original proposal, the lesser scale alternative is of nearly the same size (density) and still raises many of the same urban design questions of visual impact, wind, shadow, and pedestrian access as did the original proposal. These same concerns are expressed in a different manner under the Tidelands review of chapter 91 as public purpose, public benefit, and water related uses. What is needed is further examination of the project, the development of an alternative at a reduced scale in terms of size and use mix, a comparison of the demands the alternatives place over time on South Boston support systems, to the capacity of those systems, and a creative private/public solution to the problem of assuring that mitigation measures are in place when needed. Also needed is further discussion of ways the project alternatives might enhance delivery of public amenities, and further examination of project impacts on harbor uses and future development in South Boston.

Transportation

The most acutely felt and extensively discussed impact of the Fan Pier/Pier 4 developments is its effect on the many modes of transportation needed to serve the project. The proposed project will, by itself, cause roadway capacity failures at numerous intersections leading to and in South Boston. Taken with other proposed projects, even the full planned system including the Third Harbor Tunnel and Depressed Central Artery will not suffice to eliminate all traffic impacts. Public transportation to South Boston is practically nonexistent; even the first phase of Fan Pier/Pier 4 will require paratransit links to South Station if it is to achieve its goal of 70% public transit ridership during peak hours. Parking limitations alone,

while profoundly affecting transit use, will not overcome the driving habit of potential project occupants. Truck traffic, while not a major impact of this project, may be compromised by congestion of the street system. This congestion may also lead to diversions of commuter traffic deeper into South Boston, increasing impacts in residential areas.

The Draft EIR proposes a substantial set of mitigation measures to cope with vehicular traffic bound for the facility both without and with the Third Harbor Tunnel/Seaport Access Road. The Final EIR must provide considerably more assurance of the feasibility, funding, responsibility, and timing of these measures. Where public funding is assumed, as is the case for much of the proposed work, the funding agency should be identified and contacted to confirm the plans for the mitigation and its timing. Where private funding is proposed, the source should be identified and an unequivocal commitment to timely implementation should be made.

Investigation is also needed of potential traffic mitigation measures not considered in the Draft EIR. These include the South Boston Bypass or transit use along the rail cut, consideration of the Metropolitan District Commission's goal of eliminating commuter traffic from Day Boulevard, the early construction of a true Seaport Access Road linking the Mass Turnpike to Northern Avenue, enforcement to assure the availability of constructed capacity, and system operation changes to limit or eliminate commuter and truck use of A Street, D Street, L Street, and other residential streets in South Boston. The South Boston Traffic Study proposed in the Boston Traffic and Parking Department comment, to be partially funded by the proponent and supported by the Executive Office of Transportation and Construction, is a sound first step in assessing these additional mitigation needs and in identifying a full package of vehicular access mitigation for the Final EIR. The elements of this package should be documented completely in terms of funding and timing, as is the case with the other measures proposed.

Traffic impacts may also be mitigated by a reduced scale alternative, which should be seriously considered. As pointed out in the comments by the CAC, the EOTC, and others, both size reductions and use mix changes should be investigated with the aim of determining the maximum size of development that can be supported by probable traffic movement capacity. For both the

lesser scale alternative and for a reduced scale alternative, project phasing should be determined by the anticipated timing of mitigation measures. A clear schedule relating the demands of this and other projects to anticipated roadway capacity should be provided. Such size, mix and phasing alternatives might also play a positive role in responding to many of the other concerns detailed below.

Transit systems must also be more extensively considered. The MBTA points out that the project will have measurable effects on the Green Line westbound, as well as the Red, Blue, and Orange Lines. It also appears that some of the transit capacity calculations may be overly optimistic. The additional available capacity assumed by the proponent should be confirmed with the MBTA. Analyses should also be prepared of impacts on the more remote segments of the system that will be substantially affected, such as the Green Line westbound. Where actions by the proponent or the MBTA are proposed to improve capacity, the MBTA should be contacted to confirm the priority assigned to those improvements, the probable availability of private or public funds, and the anticipated date of construction.

Additional consideration must also be given to private or private/public transit or paratransit links between South Station and the project site. While 4,000 feet is a reasonable walk on a fine spring day, it will divert few automobile drivers in February. The provision of rapid, comfortable, reliable transfer from South Station will be critical to the success of the project and to limiting vehicular traffic. The importance of this element, especially in the short term, cannot be too highly stressed. In this regard, the innovative proposal for a people mover brought forward recently by the proponents of the World Trade Center should be specifically considered. In the long term, public investment might be brought to bear in relocating the Red Line to serve the area, providing a direct Blue Line Link to the airport, or other capital intensive plans to develop public transportation in South Boston. Whether any such long term proposals are reasonable expectations in time to be of any service to this project is in great doubt. The MBTA should be approached concerning these plans, their priority, funding, and timing, and the results reported in the FEIR.

Finally, as pointed out most eloquently by the Office of Coastal Zone Management and the EOTC, further serious consideration of and private commitment to water based

transportation must be provided in the FEIR. This consideration should extend to all uses of water transportation as they relate to this project, with particular emphasis on: communter boat access for persons who will work at the development site; access to and from Logan Airport; and movement among key public destinations within the inner harbor. The Final EIR should include the feasibility study referenced in the Draft EIR as well as any additional analyses that may be appropriate.

It is not my intent in this or any of the following areas of concern that this project bear all of the responsibility for proposing, assessing, funding, or carrying out mitigation efforts. Rather, it is my intent that the proponents here, other private developers in South Boston, major landowners, the City of Boston, and the Commonwealth all engage in a dialogue to reach the goal of a sound support system to serve this and other existing and planned development in South Boston. The results of this dialogue must be reported in the Final EIR. I will suggest, in the final section of this discussion, a mechanism that may serve this end without unduly burdening this or any other single project.

Infrastructure

While perhaps not as dramatic or as noticeable as the effects on transportation, there are also substantial concerns with the ability of water, sewer, storm water, gas, and electrical systems to serve the total level of development in the project area. In my role as Chairman of the Board of Directors of the Massachusetts Water Resources Authority, I am particularly sensitive to the water and sewer implications of a development that will be the equivalent of adding a small town to the system. The Boston Globe, on January 24, 1986, carried an article reporting electrical supply problems in the South End, an area undergoing less intense development than that proposed for South Boston. Natural gas, while abundant at the moment, has historically been subject to both production and distribution shortages, nationally and locally. For the level of total development proposed for the north shore of South Boston, each of these systems must be carefully evaluated and measures to assure increased capacity must be developed.

The proponents have, through the Draft EIR, provided the demand data and impact assessments to identify the potential shortfalls in each of these areas. What remains is to determine

the impacts of future development, the needed remedies and, as is the case in transportation, to apportion the responsibility for these remedies equitably among private proponents for this and other South Boston projects and between the private sector as a whole and the public sector.

The comments of the Boston Water and Sewer Commission provide the basis for a sound approach to the water and sewerage aspects of this effort. In essence, they ask that some private funding be provided to upgrade parts of the sewer system in a timely fashion. I endorse this approach, which might be funded through an infrastructure pool or by direct private construction of portions of the needed improvements. The Final EIR should explore these measures, document those to be carried out Boston Water and Sewer, commit to those to be carried out by the Fan Pier/Pier 4 proponents, and identify those likely to be the responsibility of other major developments in the area.

In addition, the Final EIR should explore both water conservation and sewage flow reduction. The water supply of the MWRA is a fixed resource for the foreseeable future. It is only by conservation that the system will be able to meet the demands to be placed on it over the next two decades. The Final EIR should determine water conservation measures achievable, on site or elsewhere, describe measures to set off the new demands of the project, and make commitments accordingly. In terms of sewage capacity, the existing and proposed MWRA sewage treatment plants are also a fixed resource. The proponent should explore, with Boston Water and Sewer, measures that both might take to reduce infiltration and inflow to reduce the total burden of peak flow to the treatment plants. This examination may also include contact with the MWRA to identify non-Boston I/I reduction possibilities, but I expect that sufficient I/I can be found and removed in Boston to meet the 2 for 1 policy that is now expected of suburban communities. This should be the goal of this effort, which should be reported on the Final EIR.

Storm water management, as pointed out by the Metropolitan Area Planning Council, also requires some additional attention in the Final EIR. Conceptual storm water management plans should be presented in the Final EIR, along with a discussion of and commitment to measures to limit the potential effects of storm water discharge on Boston Harbor.

One neighbor to the site, Cabot, Cabot & Forbes, has

suggested in their comments the idea of incorporating an underground utility tunnel in New Northern Avenue. This concept should be investigated with the major utility suppliers, including Boston Gas and Boston Edison, to determine its feasibility. Such a concept might allow for the provision of new service to the site and other sites which will apparently be needed to meet the demands of the proposed project and other projects. It is also an ideal candidate for private funding by this and other developers in the area.

Tidelands/Chapter 91

The Draft EIR provides a discussion of the methods proposed by the proponent to meet the standards of chapter 91. As pointed out by the Division of Wetlands and Waterways, the major concerns under chapter 91 are public purpose, public benefit versus detriment, and consistency with the policies of the coastal zone management program. Several related issues were brought forward as urban design concerns by many of the commenters on the Draft EIR. These included visual effects, wind and shadow effects, and provisions for public pedestrian access.

The notion of public purpose is taken in the Draft EIR to mean public access to and use of the waterfront. The Executive Office of Communities and Development raises the important question of occupancy by a spectrum of the public as a criterion. The Final EIR should speak to this point clearly and consider a broader range of income levels for residents, as it has agreed to do for local small businesses.

Public benefit, as interpreted under chapter 91, includes the provision of ample water related facilities, public use of those facilities, and public access to those facilities. In this regard, the Office of Coastal Zone Management has suggested a more intensive use of the bulkhead for docking, more explicit connection to the Harbor Walk, increased emphasis on water transportation, and the provision of more transient slips for water access to the site. The Fan Pier/Pier 4 Citizens Advisory Committee has raised the question of more general public benefits, such as local job commitments, use of linkage funds to support affordable housing, and other off site benefits of the project. The Final EIR should explore the suggestions made by the reviewers for increased public benefit, direct and indirect, and for increases in water dependent uses. In this analysis, explicit consideration should be given to the role of the canal

and underground parking in providing public amenities and the positive and negative effects of these elements on the master plan.

The Final EIR should examine each of the policies of the Coastal Zone Management Program, as articulated in the CZM regulations, and demonstrate how and to what degree each is satisfied by the project and its alternative. The Harbor Park Advisory Committee should also be consulted in this regard.

In terms of visual effects, concerns were expressed with the canyonization of New Northern Avenue, relationship to development proposals for nearby parcels, visual conditions along the proposed canal, visual connection between the inland side of the project and the public open spaces at the waters edge, the propriety of a major tower structure close to the water's edge, and numerous site layout and design questions. The Final EIR should consider the design of the project in light of these comments and propose one or more alternatives in response to them. One of these alternatives should represent a reduction in total project square footage in order to provide greater flexibility in site layout and to reduce the total mass of the project.

Wind and shadow effects were also extensively discussed in comments. The thrust of these concerns was with the wind and shadow effects on the major public open spaces located to the north of the major building masses and the canal and plaza spaces internal to the project. The wind environment on New Northern Avenue will also be of great importance. Wind and shadow effects should be considered in responding to the requirement for a further consideration of alternatives. It should be noted that I did not require wind tunnel testing in the original scope for this stage of the project. That is still the case, since the wind erosion testing provides sufficient information for master plan decisions. More detailed wind analyses will be appropriate at the design stage and will be reviewed by the BRA and this office after the completion of the Final EIR and the selection of an alternative for design.

Finally, many urban design comments dealt with public access, both physical and visual. With the major public spaces located north of the main building masses, accessed from the east and west, and apparently isolated by grade changes, there is some question as to the level of "invitation" provided to members of

the general public to enter and use these spaces. This concept, important here and in the considerations of public benefit under chapter 91, should be explored in the Final EIR and every effort should be made to provide visual and pedestrian pathways from downtown Boston and from new Northern Avenue that lead the public to open spaces and encourage their use by non-residents, as well as project residents and visitors. Specific consideration should be given to the effects of access on the use and value of public open space and water dependent uses.

THE FINAL EIR: A PROCESS FOR RESOLUTION

The Fan Pier/Pier 4 project represents a unique opportunity both for the developers and for the public. While many concerns have been raised by the project as presented in the Draft EIR, virtually all reviewers have expressed a conviction that a successful final project can result from the process now under way. It is important that the spirit of cooperation fostered by the project proponent not be allowed to fade in the coming months. To that end, I propose three stages of review over the coming months.

First, I suggest that the Fan Pier/Pier 4 Citizens Advisory Committee remain a focus for ongoing public review of the developing master plan and refinements considered for the Final EIR. To this end, I ask that the MEPA unit be apprised of meetings of the CAC and receive minutes of those meetings. The proponent has agreed to continue meeting with the CAC over the coming months and to fund secretarial and mailing costs for the CAC. My office will attend CAC meetings at critical project junctures and actively seek the input of the CAC in the review of preliminary data and of the Final EIR. In this fashion, the excellent work carried out by the CAC to date can continue to guide and inform the proponents' consideration and the agency review of the project

Second, I propose that a Review Committee of appropriate public and private actors be established to review mitigation plans as they are developed. This group should include representatives of all public agencies with a role in carrying out mitigation actions, private utilities that will ultimate serve the project, and the proponents for other projects in the area. The EOTC has offered considerable assistance in transportation matters. I invite the active participation of the BRA in this process. My office stands ready to assist in

convening this group and moderating its discussions. In order for these discussions to be most meaningful, I ask that the Fan Pier/Pier 4 proponents, early in their considerations for the Final EIR, develop a tentative listing of proposed mitigation measures and a preliminary assignment of responsibility for those measures to public agencies, private entities, and public/private partnerships. These may then be discussed with all concerned parties prior to the expenditure of major efforts for analyses. In this fashion, only the feasible measures need be subject to rigorous analysis. In addition, the agency/proponent review forum will provide a clearinghouse for funding and timing information that will be essential to the Final EIR.

The logical third stage is the Final EIR. It will serve to document the progress made by the proponent, the responses to the concerns raised above and in the comments, the results of the ongoing public review by the CAC, and the multidimensional mitigation planning and commitments achieved in the agency/proponent forum. It will be the result of a process extending over the next several months and will provide an opportunity for broad public review of the results of these efforts and, it is hoped, will lead to closure on the outstanding issues.

January 30, 1986
DATE

JAMES S. HOYTE, SECRETARY

JSH/SD/bk

U.S. Department
of Transportation
**Federal Aviation
Administration**

New England Region

12 New England Executive Park
Burlington, Massachusetts 01803

JAN 1 0 1986

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ENVIRONMENTAL AFFAIRS

Mr. James Hoyte, Secretary
Execuitve Office of Environmental Affairs
Leverett Saltonstall Building
100 Cambridge Street
Boston, MA 02202

Attn: MEPA Unit

Dear Mr. Hoyte:

We have reviewed the Draft Environmental Impact Report (DEIR) for Fan Pier/Pier 4 Development. Our review has been with respect to potential impacts on air traffic operations of the Boston-Logan Airport.

For the location and construction of the facilities in close proximity of the airport, we must be assured no hazard, based upon FAA Federal Aviation Regulation (FAR) Part 77 Surfaces, is created. To this end the proponent has filed the FAA Form 7460-1, which is currently under review, as Case #85-ANE-340-OE. As soon as the agency's evaluation is completed, our findings will be made available.

We appreciate the opportunity afforded to us to review this DEIR. For any further information, our contact person is Mr. Ashraf Jan (Telephone: 617-273-7060).

Sincerely,

Vincent A. Scarano
Manager, Planning & Programming Branch

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RECEIVED
JAN 23 1986
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ENVIRONMENTAL AFFAIRS

January 15, 1986

Mr. James S. Hoyte, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Dear Secretary Hoyte:

We have studied carefully the Draft of the Environmental Impact Report of the Fan Pier Development/Pier 4 Development. We have been present at two presentations of the prospective developers as a Trustee of The Boston Harbor Associates, and as a member of the Harborpark Advisory Committee.

We believe:

1. It can not be considered as an isolated, individual development. To the contrary, the total potential development area of South Boston must be considered as a totality for it is the largest total development in the contemporary history of the city.

2. The E.I.R., while responsive to the Scope, thereby had no reference to the maritime future of the city--Fish Pier, the blue-collar jobs of E.D.I.C., the MASSPORT Marine Terminal, the major Conley Container Terminal. At present, the traffic from these growing maritime areas needs drastic and immediate assistance--Northern Avenue Bridge, Summer St. Bridges, Central Artery, etc.

3. The size, and resulting traffic congestion, of the total development therefore affects the movement of foreign import/export freight of the New England area.

4. Fan Pier and the total South Boston development is an inherent part of the city's fabric--the downtown business district, East Boston, Charlestown.

5. The Fan Pier/Pier 4 is one-eighth of total development area at one-third of the total proposed cost to the developers--$800,000,000 out of $2.5 billion.

6. The cost to the City/State/Federal governments is estimated at:

Seaport Access Road	$ .6 Billion
3rd Harbor Tunnel	.7 Billion
Central Artery Depression	1.3 Billion
Red Line Diversion	150 Million
Shuttle Loop	25 Million
Airport Downtown Loop	300 Million
TOTAL	$ 3 Billion

The above has no reference to the Northern Avenue Bridge, the Summer Street Bridges, the depressed railroad highway, the lights, etc., for expressways through South Boston streets.

7. Above all, we remember mutually the political and human uproar 25 years ago, when the people of East Boston resisted conversion to be one long extended runway. The people who live, work, and park in South Boston will be equally aroused.

Progress must be accepted, but construction of any or part of the total area should not be undertaken until the planning and financial commitment and funding is firmly in hand.

The Fan Pier/Pier 4 has ably raised the issue of the responsibility for total planning.

Sincerely,

THE BOSTON SHIPPING ASSOCIATION, INC.

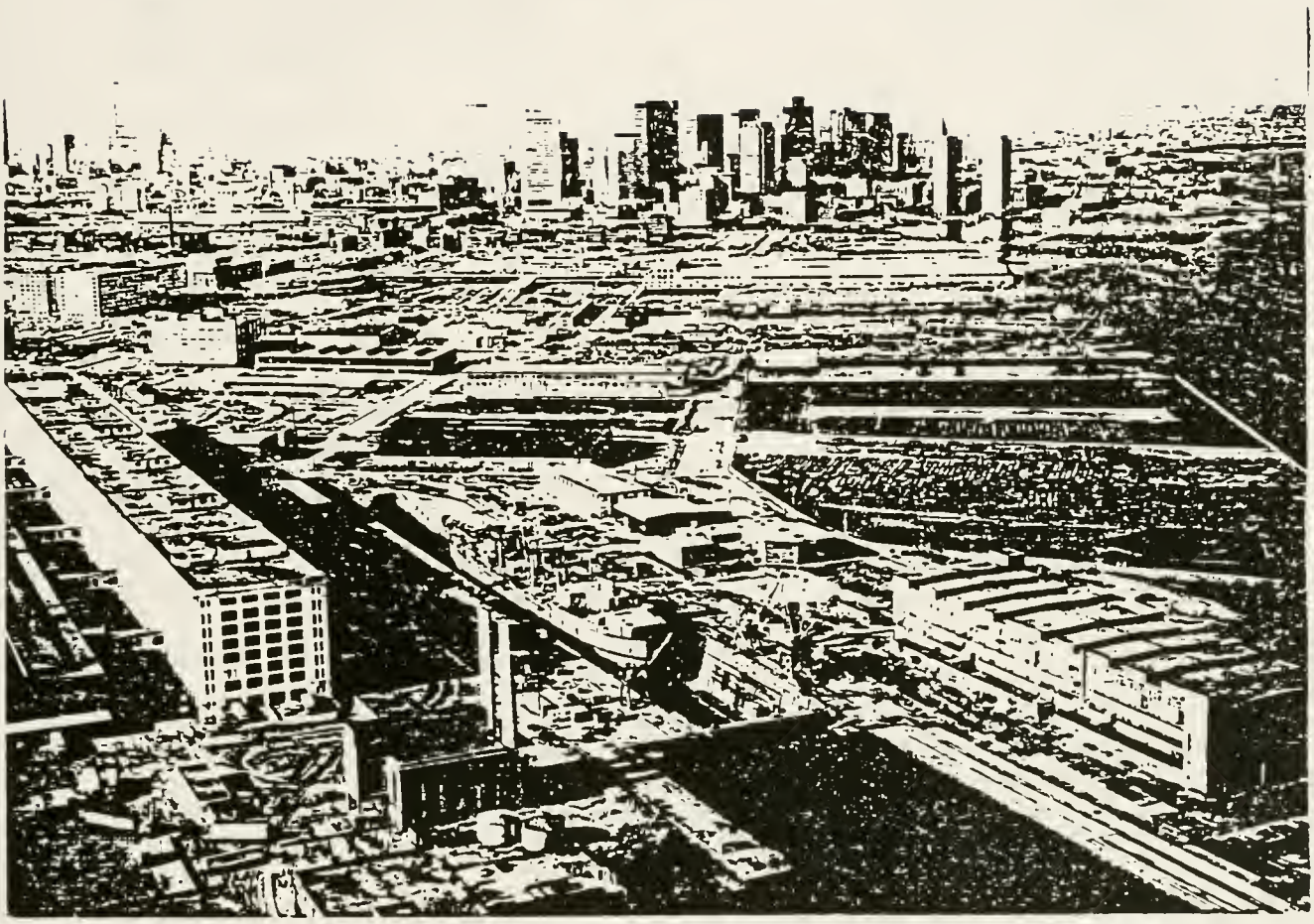
Arthur Lane

Arthur Lane
President

AL/kdp

enc.

cc: R. Giesser, MASSPORT
L. Downey, Harborpark Advisory Committee
T. Ennen, Boston Harbor Associates
M. Older, Boston Redevelopment Authority
Membership, BSA



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426-6034

259 SUMMER STREET

January 17, 1986

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JAN 22 19[illegible]
OFFICE OF THE SECRETARY OF
ENVIRONMENTAL AFFAIRS

The Secretary
Executive Office of Environmental Affairs
Leverett Saltonstall Building
100 Cambridge Street
Boston, MA 02202

Attn: MEPA Unit

Re: Draft Environmental Impact Report
Fan Pier Development
Pier 4 Development
EOEA #4426/4584

Dear Sir:

We have reviewed the above Draft Environmental Impact Report and wish to make several comments.

In general, we support the so-called "Lesser-Scale Alternative", however, the way in which certain issues are addressed is of concern to us and will impact directly on our own ability to accomplish future development plans.

1. Project Area and Description

The Boston Wharf Company (BWC) is described as having "no plans for significant new construction" which is substantially correct for property north of Summer Street, however, south of Summer Street BWC owns approximately 13 acres of land where significant new construction is feasible and for which planning is now underway.

Because of the above and the recognition that building use changes from warehouse/industrial to residential/commercial implies an increase in the number of building occupants and therefore an increased demand on infrastructure, traffic management and parking requirements, we are concerned that an appropriate definition of BWC development intentions was considered when addressing various environmental impacts and proposing mitigating measures.

Finally, BWC does not own 6,200,000 square feet of built space, as indicated, but approximately 3,000,000 square feet of built space.

2. Development Alternatives

This and other sections of the report discuss extending Sleeper Street, Farnsworth Street and Pittsburgh Street across Northern Avenue onto the site as an element of masterplan organization. Although, not shown to occur on plans included in the Report, it can be construed from the text that the proposed intent is for an intersection between New Northern Avenue and Farnsworth Street to be built. We cannot agree with such a proposal either expressed or implied because:

a. The introduction of thru traffic to Farnsworth Street will do nothing to enhance the operation of the proposed street system (New Northern Avenue and the Sleeper Street/Pittsburgh Street Seaport Access Roadway one way pairs), but will cause excessive traffic congestion on Farnsworth Street and may inhibit traffic flow on New Northern Avenue with the additional traffic lanes entering at a point midway between traffic lights.

b. Farnsworth Street is ten feet narrower than Pittsburgh Street and it is difficult to provide a proper street section with the sufficient capacity to accommodate the anticipated traffic volume when allowances are made for sidewalks of adequate width for safe pedestrian circulation.

c. The Boston Wharf Company is planning to build and has approval from the Boston Redevelopment Authority of the Schematic Design for a parking garage fronting on Farnsworth Street with approximately 330 parking spaces to serve the area. Vehicles entering and leaving the garage, particularly in times of peak usage, will exacerbate the congestion on Farnsworth Street if open to thru traffic. Congestion is not expected to be a problem if Farnsworth Street remains a local service street.

d. Over time, the area owned by the Boston Wharf Company, north of Congress Street, will be redeveloped as a vital city neighborhood with places for people to live, work and play. Therefore, it is essential that traffic circulation through the area be provided for in such a way that all buildings are accessible to both service and pleasure vehicles, but also in such a way that traffic congestion is eliminated. To that end, our analysis of traffic patterns in the area indicates that because of proximity in the property and existing street widths, Pittsburgh Street is best as a thru street and Farnsworth and Stillings Streets are best as local service streets with connections to Pittsburgh Street.

3. Traffic and Parking

A. In general terms, we are concerned that many of the proposed mitigation measures intended to solve a recognized traffic problem depend on implementation of several roadway improvement and construction projects (many with our qualified support) and the modification of others currently in design stages. These projects are to be funded and/or built by various federal, state and local agencies and are in varying phases of the planning, approval and funding process. Should the Fan Pier and Pier 4 projects be built and the publicly funded roadway projects proposed as mitigating measures be cancelled, postponed or altered then the viability of not only our future development plans but those of the proponents and others is in question.

B. In order to provide additional roadway capacity, the Report proposes that the links between New Northern Avenue and Congress Street which are intended to be part of the exit and entrance system of the Third Harbor Tunnel and Seaport Access Roadway be built in advance and regardless of whether or not the Seaport Access Roadway is built.

We can agree with this proposal only if the roadways are constructed concurrently with or subsequent to the construction of New Northern Avenue; if the intersection of Pittsburgh Street and New Northern Avenue remains closed until the two New Northern Avenue/Congress Street links are open and operational; and if the western curb line of the southbound lane be located no closer than sixty feet to the east of our buildings along Stillings Street allowing our tenants to continue their loading and servicing activities to these buildings and at 347 Summer Street as they currently do and cannot do from another location. To locate this curb any further to the west will prevent our tenants from continuing to operate in these buildings entirely.

4. Infrastructure

We have already expressed our concerns over the accuracy of the Report's assumptions regarding our development intentions when assessing impacts on existing and future infrastructure (see item 1).

We find that no real mitigating measures to rectify existing and/or potential deficiencies in infrastructure systems are proposed, rather the Report implies that improvements contemplated by utility companies and proponent coordination with these companies will serve to mitigate adverse impacts on the systems.

Without specific commitments by utility companies to provide for this and other development projects in the area, we are concerned that we may find ourselves suddenly unable to provide for demand on infrastructure within our property when the proposed projects are complete when prior to their completion demand was being satisfied.

We are looking forward to the realization of these two projects and we will be happy to work with the proponets toward resolving difficulties of a mutual nature. Finally, we will appreciate being kept informed as to the progress of the two projects and, in particular, wish to be notified of any changes affecting our property.

Sincerely yours,

BOSTON WHARF COMPANY

Robert Kenney
General Manager

cc: John K. Dineen, Esquire, Gaston Snow & Ely Bartlett
Mr. Timothy J.R. Harding, Town and City Properties PLC
Mr. Bernard Strassner, Mr. James Wade, Rose Associates
Mr. Bruce Johnson, Jung/Brannen Associates, Inc.

1386k

City of Boston
The Environment
Department

Boston City Hall/Room 805
Boston, Massachusetts 02201
617/725-4416 or 725-3850

21 January 1986

OFFICE OF THE SECRETARY
JAN 23 1986
RECEIVED

James Hoyte, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor
Boston, MA 02202

ATTN: MEPA UNIT
RE: FAN PIERS AND PIER 4 PROJECT - BOSTON HARBOR

Dear Mr. Secretary:

I am pleased to communicate to you the following comments of the Harborpark Advisory Committee, (HPAC), regarding the Draft Environmental Impact Report, (DEIR), for the proposed Fan Piers and Pier 4 Project, (FP4), on Boston Harbor.

HPAC's perspective, refined through a year of meetings, briefings and reviews of existing and proposed harbor projects and conditions, is primarily based on three mandates:

1. To promote the development and expand the commonwealth of our waterfronts.

2. To enhance versus degrade the economic and environmental quality of the life in our city, in Boston Harbor, and especially in the neighborhoods abutting the harbor through the best uses of our waterfronts.

3. To seek waterfront development and use which fulfills the promise of creating common economic, social, and physical turf for all citizens.

HPAC requests the assistance of the Secretary and his staff in our pursuit of additional information which will form the basis of our recommendation to the BRA and other city and state agencies regarding the FP4 project. Given the uniqueness of this project, its size, its implications for the ongoing renewal of Boston Harbor, its substantial environmental impacts, and the extraordinary demands it places on existing review processes, we place crucial reliance on the MEPA function to reveal objective and comparative information for our evaluation.

Urban Design

The FP4 DEIR does a fine job of displaying the impacts of the proposed designs. However, the so-called lower scale alternative is not adequately different from the base proposal to provide HPAC with a meaningful alternate and therefore, truly alternative impacts.

HPAC requests that the scope for the FEIR require the composition and evaluation of an alternate design producing a significantly lower build scheme and impacts. We recommend that definition of this alternative be achieved by blending of several characteristics. HPAC has defined these characteristics as:

- smaller scale -25 to 30% less total square footage.
- significant reduction or elimnation shadow impacts or major public spaces.
- reduction in height and relocation inland of the proposed Pier 3 tower.
- shifting land use to more housing and less office space.

HPAC believes that a sensitive mix of the above characteristis in defining an alternative to be evaluated in the FEIR will produce a distinctly different model to compare to the proposed designs. While we have achieved some consensus on what that mix might be, you and your staff are far more professionally quaified to define this requirement than is our committee. HPAC emphasizes that this alternate be analyzied for its traffic impacts as we believe that in addition to its urban design implications it will produce significantly less vehicle trips.

Public Access

HPAC has come to appreciate that successful public access is a complex undertaking and we very much appreciate the proponents efforts in this regard. We are also aware that one of the major considerations under the Chapter 91 licensing program is the quality and diversity of public access.

We request that an alternative scheme be composed whose goal would be to take far greater advantage for the public of the extraordinary access opportunity provided by this great waterfront location. We recommend that the characteristics of this alternative be:

- Provision of a substantially larger, unshadowed public assembly area, with defined programming options for its use and estimates of the numbers of people sitting and standing which it would accommodate, to be located on the main channel face of Pier 3.

- Relocation of the Pier 3 hotel tower inland along with it traffic turn around/drop off point. Any use placed on the current tower site should be more public and present, at its ground floor, designs and functions which will directly relate to, enhance, and join with the new public assembly area so as to create a real destination for the general citizenry.

- Provision of continuous access around Pier 4.

- Full evaluation of and defined alternatives to the proposed designs in the area leading from the proposed new Northern Avenue Bridge to downtown end of the proposed canal. We know little about this area but view it as the most vital people link to the Fort Point Channel and downtown Boston.

HPAC would also like to have ground level views prepared of the sightline from new Northern Avenue to the harbor down the two main thoroughfares leading from that street over the proposed vehicular bridges and to the harbor.

HPAC also requests a clear quantification and mapping of public open space. Semi public spaces such as hotel and condominium lobbies, restaurants and restaurant plazas, and roads and traffic turn arounds should be separately quantified and mapped. We request this analysis for both the "lower scale alternative" and HPAC's proposed "smaller scale alternative."

HPAC is also very concerned about the proposed canal. Given Boston's climatological conditions and the shadow impacts and scale of the buildings which abut it, the canal may well turn out to alienate pedestrians except during the months of July and August. Boston has many windy, sunless places and people don't use them. We fear that the canal will not enhance the retail spaces along its edges, encourage small boat usage, nor form a link to the public spaces on the face of the Fan Pier. While we are sensitive to the canal as a "designer's concept" but its high cost, (some $12 million according to the developer), when contrasted with its problemmatical environmental benefits and its impact on overall access may not be a reasonable trade off. Frankly, HPAC has been unable to refine this concern into a definable alternative which captures the values which the creative designer is attempting to achieve but overcomes the imposed and unfriendly environmental conditions and known patterns of how people react to and use public spaces in Boston. We therefore, request the Secretary's professional assistance in addressing this concern.

Water Dependent Uses

HPAC requests that an alternative be defined and evaluated which dramatically increases the provision for water dependent uses at the project. Specifically:

- A full explication and rendering of boating services and facilities proposed for the Fort Point Channel end of Pier 1 along with a clarification of those maintenance and operational functions necessary to provide a range of boat services which will and will not be sanctioned by the developer at this location. It would also be helpful to know what role the developer would be willing to play in supporting the accommodation of off-site but necessary services.

- Active reuse of the entire harbor face of the Fan Pier for docking "and over the seawall" access. Given projected demand for general access to and from boats, current and anticipated unmet demand for water transportation facilities and the recognition that docking facilities enhance passive waterfront areas, the committee has concluded that FEIR alternatives must incorporate and evaluate full active use of all available bulkheads.

- Provision of a water transporation terminal along the face of Pier 4 facing Commonwealth Pier.

- A detailed description and mapping of all boat facilities including vessel types to be accommodated, public and private, and a description of the necessary access and infrastructure to support this proposed berthing plan.

- Expansion of "public landings" for dinghy's; small, and moderate sized private vessels. Where one is proposed 3 to 6 strategically located facilities would begin to meet the demand created by a project of this size.

- Provision of docking facilities and information location for City of Boston Harbormaster patrol.

Sewage/Water Pollution

The DEIR is, by the admission of the proponent, incomplete with regard to the impacts of the proposed project on water quality, (DEIR VI. 2-20), but does conclude that..."some wastewater flow will be contributed overflow by the Fan Pier and Pier 4 Developments." "Some" is not quantified nor is there an assessment of the water quality impact.

HPAC requests an alternative be designed which results in no additional project generated dry or wet weather discharge of untreated wastes to Boston Harbor or its tributaries.

Infrastructure

The FEIR should require that analysis of and commitments regarding renovation and expansion of the existing electric and gas service to serve PF4 and the background development be garnered from Boston Edison and Boston Gas. HPAC's goal is to guarantee that the existing levels of utility service to the South Boston Community and area businesses degrade.

The FEIR should require the proponent to seek certification of the capacity of the water supply system to fight high rise fires, specifically, pressure and volume adequacy from the BWSC and Boston Fire Department. Special attention should be paid to the provision of facilities or access requirements of the Marine Firefighting Division of BFD.

Traffic

HPAC has coordinated its review of FP4 with the Fan Pier Advisory Committee, (FPAC), especially in order to understand the reaction of the South Boston Community to impacts resulting from this proposal. From our meetings with FPAC and with the community, we can conclude that no single issue has drawn stronger reaction than the anticipated traffic impacts. Several specific observations are supported by HPAC.

1. The existing level of traffic service at many of the studied intersections is inadequate. Averages of the system capacities cloud the real traffic circumstances which produce serious degredations of service with great frequency.

2. HPAC supports the community contention that existing traffic impacts are intolerable.

3. Beyond the Commonwealth Pier Viaduct and bounded by First Street in South Boston is an area which houses a large number of businesses, light industry, and water dependent port facilities all of which need good inland access to survive. Current truck access is poor degrading the efficiency and economic competitiveness of these firms. Additional inland development without major roadway expansion and the provision of an efficient, safe truck route will likely strangle these functions.

   HPAC has a special mandate to support job generating industry especially water dependent industry. We believe that the intent of Chapter 91, as amended, enlists state agencies, and therefore MEPA, in this special responsibility.

4. While much attention has been paid to South Boston traffic impacts, the implications of access across the new Northern Avenue Bridge to the north absent a replacement for the Central Artery or during the construction of the depressed central artery are gruesome.

5. The 1995 fall build assumes a depressed central artery in place. HPAC has been advised that this schedule is optimistic in the extreme.

6. The City/BRA has proposed a program of substantial transportation improvements for the area. No data is available which addresses the planned capacity of this expanded and rehabilitated transportation system.

In the Urban Design section of this letter HPAC has requested a "smaller scale alternative" which, aside from its direct physical impacts, will no doubt generate less traffic.

While HPAC has made its best efforts to educate itself on traffic planning and impacts, we are faced with a vertable blizzard of plans, projects, time tables, estimates, facts and conjectures. In order to proceed toward a final recommendation on this project, HPAC as well as the impacted communities needs to have some reliable estimates of the traffic impacts which result from a number of possible scenarios. At the same time, we admit that advisory committees are not fully qualified to define the best approach to further traffic studies. With these recognitions in mind, our best, admittedly complicated request for the FEIR traffic study, is follow on the accompanying chart:

RECOMMENDED TRAFFIC IMPACT ANALYSIS

	Proposed "Lower Scale" Alternative		Requested "Smaller Scale Alternative"	
	1990	1995	1990	1995
Existing System with N.A. Bridge				
Existing System with N.A. Bridge plus Seaport Access and Bypass Route				
Existing System with N.A. Bridge, Seaport Access, Tunnel and Bypass				
Existing System with N.A. Bridge, SPAR, Tunnel, Bypass and Depressed Artery				
City/BRA Plan without Tunnel and Depressed Artery				
City/BRA without Depressed Artery				
Worst Case = during Artery Depression Project				

In addition, the combination of business generated truck traffic, private development construction traffic, and roadway construction is a major concern. The FEIR should require the proponent in conjunction with the BRA, Massport and EOTC to study the effectiveness of the proposed "by pass road", (the former "Seaport Access System Railroad Cut" option), as an exclusive and compulsory truck/construction traffic roadway. In particular, is there any way of guaranteeing that trucks do not select alternate means of reaching the South East Expressway and the Mass. Pike and also guaranteeing that access to the industrial/port area has high quality access.

Some years ago, Dorchester Avenue between Fort Point Channel and Summer Street was closed by the Federal Government. Thereby, barring a major relief artery from public use. The South Boston Community, pedestrians and bicyclists have paid dearly for this short sighted actions. HPAC suggests that the FEIR investigate reopening this route to traffic, pedestrians, bikes, and trucks. The proponent's efforts in this regard should be assisted by City agencies, the BRA, EOTC and our elected political leaders.

The construction section of the DEIR recommends a host of good mitigation measures. HPAC would like to see thesse measures implemented and requests that the FEIR maximize the evaluation of additional water based mitigations such as barging of any and all equipment and materials to and from the site.

As with several other sections of this letter, we are relying on the Secretary and his staff to interpret and refine our concerns and recommendations so that forthcoming analysis will truly inform HPAC and appropriate decision makers.

In conclusion we would like to report our appreciation for the responsive and diligent work of the developers and their consultants in familiarizing this committee with their proposal and its impacts.

HPAC is prepared to assist the Secretary and his staff in any way which advances the goals of Harborpark.

Respectfully,

Lorraine M. Downey, Chairperson
for the Committee

cc: Mayor Raymond Flynn
Senator William Bulger
Representative Michael Flaherty
Councillor James Kelly
Stephen Coyle, Director, BRA
FPAC Members

WORLD TRADE CENTER BOSTON

Commonwealth Pier • Boston, MA 02210 • (617) 350-6600

January 21, 1986

RECEIVED

JAN 23 1986

OFFICE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS

Honorable James S. Hoyte, Secretary
Executive Office of Environmental Affairs
Commonwealth of Massachusetts
100 Cambridge Street, 20th floor
Boston, MA 02202

Re: Fan Pier/Pier 4
Draft DEIR
EOEA No. 4426/4584

Dear Secretary Hoyte:

This letter is submitted in accordance with the provisions of the Massachusetts Environmental Policy Act, M.G.L. c.30 §62H ("MEPA"), and of regulations implementing MEPA which are promulgated at 301 C.M.R. §10.00 et seq. (the "MEPA regulations "). The comments contained in this letter are made on behalf of the BOSCOM Partners that have constructed the World Trade Center at Commonwealth Pier on Northern Avenue in Boston and are now planning for its expansion (the "World Trade Center Expansion") across the street. The comments contained in this letter relate to the Draft Environmental Impact Report ("DEIR") submitted in December 1985 by HBC Associates and the Boston Mariner Company (the "Project Proponents") for development of Fan Pier and Pier 4 ("the Projects").

The Projects will be immediate neighbors of the World Trade Center. Consequently, the Partners are vitally concerned that there be a viable and well-planned development of the Fort Point Channel area where all of them will be situated. In order to accomplish this objective, the impacts of the Projects must be considered in conjunction with the impacts of other projects planned for the area, including the World Trade Center Expansion. Not only will this help to ensure that the cumulative effects of area development are understood, but it will also provide for a better understanding of how other area development will affect the Projects. This will in turn promote a better understanding of how to minimize any adverse impacts associated with the Projects. The following comments address these concerns more specifically with respect to impacts on

transportation and views.

I TRANSPORTATION

1.1 Pedestrian Circulation

In addition to the Projects, other developments of significant size are planned for the Fort Point Channel area in the near future. These proposed projects include the World Trade Center Expansion and development of the Fish Pier. As a result, Northern Avenue will become a major pedestrian corridor. Therefore, the cummulative impacts on Northern Avenue of all the projected developments must be considered in order to ensure that the avenue will be a place that encourages and accommodates pedestrian activity.

The Project views for Northern Avenue presented on page V.1-37 of the DEIR depict a wall-like effect on the Projects side. Such a treatment of the buildings may discourage the use of Northern Avenue by pedestrians. Moreover, it may result in a very windy corridor which would also discourage pedestrian environment, the DEIR should consider the following:

a. The attractions or amenities for pedestrians, such as retail space, that will be present at the ground level of buildings bordering on Northern Avenue.

b. The landscaping or other aesthetic features that will be present along the sidewalk on Northern Avenue.

c. According to the DEIR, the wind levels at the site will increase by one-third on average and generally result in a downgrading of the pedestrian comfort criteria. Consequently, the DEIR should address the types of mechanisms that would be available to minimize the increase in wind level and the attendant decrease in pedestrian comfort. We also suggest a more detailed analysis of Southwesterly winds (prevalent in summer) along Northern Avenue be studied.

1.2 Mass Transportation

Table IV.1-41 of the DEIR presents several demand reduction programs aimed at reducing vehicular trips to the Project. Some of these programs are intended to encourage mass transit usage, including shuttle bus service and improvements to South Station. In addition to these proposals, the BOSCOM Partners are seriously evaluating the construction of a "people-mover"

in connection the World Trade Center development. This would serve as a more dramatic inducement to use of mass transit. As now envisioned, the system would run from South Station and travel along Northern Avenue, adjacent to the Projects, as well as to the World Trade Center and other Massport properties in the area.

The DEIR should include, as an option, the planned development of this "people-mover" in its mass transportation analysis. Specifically, it should consider whether the Northern Avenue edge of the Projects will accommodate the potential construction of such a transit element and will be able to receive the pedestrians using such a system. In this regard it should be noted that the office spaces along Northern Avenue are supposed to be completed as part of the last phase of the Projects. Thus, accommodation for the "people-mover" should be possible.

1.3 Traffic

While the Project Proponents provided an update of the traffic projections contained the EIR for the Economic Development Incorporated Building 114 project, they did not request the BOSCOM Partners for an update of the traffic projections contained in the 1982 Pier 5 EIR. As a result, the DEIR's traffic study underestimates the size of the World Trade Center Expansion.

In the DEIR Appendix containing the Background Development Assumptions, the first phases of the World Trade Center Expansion is estimated to be 725,000 square feet. In fact, it is now expected that an additional 1,370,000 square feet of space will be created by 1990. Furthermore, it is expected that another 1,250,000 gross square feet of space will be developed by 1995.

The traffic discussion in the DEIR should reflect these updated projections in the context of the cumulative impacts of all the developments now proposed for the Fort Point Channel area. In this regard, it would be helpful to explain which intersections, in terms of their proximity to sites of the Projects, will operate at a Level of Service of E or F under the Build alternative in the DEIR description of roadway impacts.

The existing parking space inventory across Northern Avenue from the World Trade Center will be used entirely by employees and visitors to the World Trade Center and should not be planned as overflow parking of the Fan Pier/Pier 4 project.

1.4 Water Transportation

Coordination is essential in the planning of public water transportation for all projected development in the waterfront area. This will help to ensure that neither too few nor too many terminals are built. Commercial passenger boats already exist in the area. Moreover, the BOSCOM Partners are planning to install a water shuttle as part of the World Trade Center development. This service is scheduled to begin April 1, 1986. The DEIR's discussion of water transportation should deal in greater depth with the water transportation facilities planned as part of the World Trade Center development, and it should consider ways in which water transportation planning for the various developments in the area can be coordinated.

II VIEWS

The Project views from Commonwealth Pier as depicted on page V.1-49 of the DEIR indicate that the Projects, as now planned, will eliminate all views of the Boston skyline from the World Trade Center. This represents a serious adverse impact upon a facility which is already in use and which benefits from those views. Moreover, such an adverse impact would appear to be unnecessary in light of the significant density levels achieved through increased building height in the Projects.

The DEIR should address in greater detail the impact on the views from Commonwealth Pier. It should also consider alternatives in layout and massing of the buildings that would provide a view corridor from at least one vantage point at the World Trade Center.

The BOSCOM Partners have presented these comments in an effort to ensure that all projects planned for the Fort Point Channel area can be considered in a timely and thorough manner, and thereby promote development that is both vital and appealing in character. We hope that the foregoing comments will prove helpful in achieving these goals.

Respectfully submitted,

WORLD TRADE CENTER

BSA

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JAN 2 3 1986
OFFICE OF THE SECRETARY OF
ENVIRONMENTAL AFFAIRS

Committee

January 21, 1986

James Hoyte, Secretary
Executive Office of Environmental Affairs (EOEA)
Leverett Saltonstall Building, 20th Floor
100 Cambridge Street
Boston, MA 02202

Dear Mr. Secretary:

Re: Piers 1, 2, 3 and 4 Draft Environmental Impact Report EOEA No. 4426/4584

On behalf of the Fan Pier Focus Team of the Urban Design Committee of The Boston Society of Architects, I wish to submit our comments on the Draft Environmental Impact Report of the above project.

Our Committee for the past several months has been monitoring the design progress of these projects with great interest. We feel we have been constructively contributing to that process. It was with great interest that we looked forward to the Draft Environmental Report.

We were pleased to see that many of our design concerns of the initial proposal have been addressed in the lesser-scale alternatives. Pier 4 has made the most dramatic and welcome changes. We now feel very good about the plan of Pier 4. Piers 1, 2, 3 have also evolved in a positive way. In general we are strong supporters for the current lesser-scale developments as shown in the draft report. However, we would like to identify certain issues that we feel need to be addressed in the final Environmental Impact Report.

1. Traffic

Given a site this remarkable, it is not surprising that the single most important concern in our judgment involves the issue of traffic. It is now obvious to everyone that the transportation improvements are beyond the developers control. We feel that before all phases of this project can go forth the transportation agencies; Federal, State and City must commit to positive transportation improvements. It may be that the Northern Avenue Bridge, Seaport Access Road, Third Harbor Tunnel and the Central Artery improvements will be constructed as separate items and with different timing. This suggests that these development projects be linked and phased to the transportation improvements as they are made. Only transportation commitments will mitigate the problems of congestion and circulation and assure the projects ultimate strength and success.

The Boston Society of Architects
305 Newbury Street
Boston, Massachusetts 02115
Telephone 617 267-5175
A Chapter of
the American Institute
of Architects

2. Hyatt Hotel Tower

The new configuration of the Hyatt Hotel tower is desirable to the initial proposal. We feel that it can serve as the "landmark structure" for the entire project. This will affect the skyline in a positive way, avoiding "benching" (towers of similar heights) and providing more variety and interest in the skyline. A concern we have is the central passageway through the hotel lobby. If the passageway is truly to be perceived as an inviting public passageway and not private turf, the local precedents to be followed are the open passageways on the Walk-to-the-Sea at Marketplace Center and at Rowes and Foster's Wharf, and not the enclosed passageway at the Long Wharf Marriott Hotel. We would like to see sketches in the environmental report so we can better understand the design intent.

3. Pedestrian Bridge 16 (Figure III-A)

The introduction of a pedestrian bridge across the canal is a much needed link. We need to see more information on this link. Its interface with the Harborwalk and the Marine Service Office Building looks tenuous and not inclusive enough. Sketches need to be drawn to show how this link really works.

4. Open Space 9 (Figure III-4)

This major space as it is called looks like an automobile turnaround. More development is needed to show what is pedestrian, what is vehicular, and what is green open space. Sketches at ground level should show the quality of space intended.

5. Residential Towers of Piers 1, 2, 3 Figure III-4

We are concerned about the three residential towers as shown. Although we applaud the fact that these towers have been scaled down they appear to be the "tower in the park concept." The issue here is the freestanding configuration of the towers and the typology of form. These residential towers look like the adjacent office building across the proposed canal. We are left with a complex on Piers 1, 2, 3 where one's visual perception is dominated by three residential towers as figural objects, rather than by the spaces into which these towers are placed. Although we recognize that these residential building are atop low-rise bases, we need to know if these bases are sufficient enough to define and reinforce the street. We need to see sketches within the Pier 1, 2 and 3 complex revealing the street edges and major spaces. We would like to know what are the uses in the bases of the residential towers. Are they office/retail or are they just residential?

6. Northern Avenue Street (View D)

The Northern Avenue Street view has not been improved since the initial proposal. The street wall shown may lead to a canyon effect when the C.C.& F. site is developed in the future. The master plan should suggest a setback above a building base. The determination of an appropriate height of a street wall is a question of judgment, but perhaps it should be consistent with the general scale of the future C.C.& F. site. A strategy for achieving this should be addressed in the master plan.

7. The key to the success of this entire development - in terms of public use, benefit, and accessibility - are the extensive public amenities and infrastructure that will be provided (canal, lagoon, bridges, underground parking, public park, public plaza, water ferry docks, and retail uses.) Should any combination of these amenities be eliminated or substantially reduced, a reconsideration of the entire master plan will have to be undertaken. These amenities are integral to the master plan and cannot be reduced or eliminated without altering the entire concept.

8. The development of the Cabot, Cabot & Forbes property between old and new Northern Avenues is critical to the public perception of the Piers 1, 2, 3 and 4 development. We would support and encourage:

   a. design guidelines to be prepared for this property by the BRA

   b. any land sales or swaps between Mr. Athanas and CC & F that would allow the formation of more complete parcels and that would provide frontage on New Northern to the Fan Pier and Pier 4 development.

The development teams are to be commended for embarking on this undertaking. The opportunity to build complexes of this kind requires private and public commitment to go hand in hand. Therein lies the challenge. If all the technical, ecological, traffic, as well as Urban Design issues can be handled properly, then this can become an outstanding project, one worthy of its site and the aspirations of its city.

Sincerely,

John P. Sheehy

John P. Sheehy AIA
BSA, Fan Pier Focus Team Chair

JPS:ksd 4109

cc: Larry Bluestone (Fan Pier CAC)
Cynthia Howard (Fan Pier CAC)
Bob Kroin, BRA
Larry Koff, BRA
Richard Fitzgerald, Executive Director, BSA
Elizabeth Padjen, BSA
Harry Spence, HBC Associates (Fan Pier)
Ellen Watts, Boston Mariner Co. (Pier 4)
Fan Pier Focus Team Members: Willo von Moltke
Mary Otis Stevens
Felicia Clark

Building and Construction Trades Council of the Metropolitan District

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JAN 27 1986

OFFICE OF THE SECRETARY OF
ENVIRONMENTAL AFFAIRS

January 22, 1986

James S. Hoyte, Secretary
The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02202

Dear Secretary Hoyte:

The Boston Building Trades Council has examined the Draft Environmental Impact Report for the Fan Pier and Pier 4 developments on the Fort Point Channel. The Boston Building Trades offers the following comments on the Draft EIR submitted in December 1985 by HBC Associates and The Boston Mariner Company. These comments are provided under the provisions of the Massachusetts Environmental Policy Act, M.G.L. c. 30 §62H, and the regulations at 301 C.M.R. §10.00 et seq.

The Boston Building Trades has a strong interest both in the strength of the Boston economy and in the quality of life in Boston's neighborhoods. We believe the proposed development on the Fan Pier and Pier 4 is important to the continued growth of the Boston economy, while being sensitive to the needs of Boston's neighborhoods, particularly the adjacent residential areas in South Boston. As Boston's economy continues to grow, supported by the overall growth of the regional economy in the Greater Boston area, the need for new office sites continues to expand. The development of the existing financial district in downtown has progressed to a point where downtown sites for substantial office construction grow increasingly scarce. Boston is fortunate to have the Fort Point Channel area, a new district which can accomondate growth over the coming years, to meet the needs of Boston's expanding economy.

The development proposed for the Fan Pier and Pier 4 responds to Boston's office needs of the future, but does not ignore the many other needs of the City of Boston. Over a thousand units of new housing are proposed for the area together with hotel and retail uses. The City Administration has placed a strong emphasis on the need for additional housing development in Boston's downtown, to

strengthen the downtown fabric and to reduce the burden of commuter traffic on Boston's streets, and these development proposals respond to those housing needs. In doing so, they provide a model for future development in the Fort Point Channel area, consistent with the patterns of mixed-use development proposed for the Boston Wharf area.

Since a number of the members of the Boston Building Trades are residents of South Boston, we are pleased to see the focus in the EIR on solving longstanding traffic complaints of the South Boston neighborhood. The EIR makes clear that the Fan Pier and Pier 4 developments would be responsible for only 10 to 15% of the automobile traffic generated by development in the year 1995 in the Fort Point/ South Boston area. Nonetheless, these developments can focus the attention of the state and city governments on the long-existing commuter traffic problems in South Boston. Over the course of the past few years, L Street, D Street and other residential streets have become informal commuter routes for far too many of Boston's downtown office workers.

We understand that the developers' traffic planners are working with the South Boston community to develop proposals and suggestions for the city and state agencies to correct this long-term traffic problem. The Boston Building Trades is a long-standing supporter of the proposal for a Seaport Access Road and Third Harbor Tunnel, and we are encouraged by the progress towards the construction of these critical links for Boston's transportation system. The Draft EIR presents further evidence of the value of this transportation link, not only in reducing truck and automobile traffic for South Boston but in support of Boston's regional economy.

The Boston Building Trades strongly supports and endorses the proposed development for the Fan Pier and Pier 4. The Draft EIR is as thorough and complete as any document of its kind in Boston's development history. We urge that the Draft EIR be given prompt approval and that this outstandingly responsible proposal for Boston's waterfront and Fort Point Channel area proceed as rapidly as possible.

Sincerely,

Charles F. Spillane

Charles F. Spillane
Secretary/Treasurer &
General Agent
Boston Building Trades Council

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January 22, 1986

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JAN 24 1986

OFFICE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS

Mr. James Hoyte, Secretary
Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

INTRODUCTION

The Fan Pier/Pier Four Citizen Advisory Committee (CAC) has been working for over twelve months in an attempt to represent community concerns regarding the proposed development of the Fan Piers and Pier Four. The committee is comprised of representatives of most of South Boston's leading civic associations and representatives of business as well as other organizations interested in development at the waterfront.

The CAC has studied various aspects of the proposed development and has, in cooperation with the Boston Redevelopment Authority (BRA) staff, other city agencies and the developer, sought to bring about conceptual changes in design which would enhance the overall development plan. Additionally, the CAC, with the cooperation of the aforementioned parties, has looked at economic benefit issues such as jobs and linkage benefits for the impacted area. Currently, the CAC's major efforts have been aimed at dealing with the complex transportation issues which are raised by the development plans.

The CAC will continue to work on these and many other related matters as the planning process moves ahead. However, given the work which has been done to date, the CAC is prepared to and does hereby submit its comments relevant to the Environmental Impact Review (EIR) Draft for this project which has been prepared for the proponents by Skidmore, Owings and Merrill.

Our comments will highlight reaction to the EIR and to the proposed project in general. These comments are intended to represent the CAC's concerns as articulated by its membership and concerns raised by the South Boston community in several CAC meetings attended by community residents, as well as a large public meeting sponsored by the CAC on January 14, 1986 in South Boston at which over one hundred local residents were in attendance.

The comments are organized as follows:

Transportation, Traffic and Mitigating Measures: general comments on issues of concern with specific recommendations for further study and specific opinions on certain transportation issues raised in the EIR.

Urban Design: general comments on urban design as well as height and density issues; general reference to land use; public access concerns; further refinements of development plans in response to these issues.

Construction: comments and opinions on the overall issue of construction and related concerns.

Infrastructure: brief general comments.

Public Benefit: general comments on strategies which promote the public interest with specific recommendations designed to benefit local residents as well as the general public.

Although every comment or suggestion may not be relevant to the MEPA review process currently underway, it is the CAC's intent that its first public commentary on this proposal be comprehensive and be consistent with the overall scope of our review. It is further intended that these observations be generally useful to the Mayor, the Boston Redevelopment Authority, the proponents and, most importantly, the general public.

I. TRANSPORTATION, TRAFFIC and MITIGATING MEASURES

The overall issues of transportation and traffic are currently predominant in the public review and community interest regarding the proposed development. Central to much of what has been discussed to date is the fact that the current transportation and traffic situations are not satisfactory to the South Boston community. Therefore, if the Fort Point Channel is to be developed, not only must new plans and strategies be employed, but old problems must be addressed - now.

(a) The City of Boston's Transportation Commissioner has recently committed to a comprehensive neighborhood traffic management needs assessment. The CAC is fully supportive of this initiative and believes that it could result in improvements to the current situation. Yet, as many of the committee's experienced members have noted, the key element in making the traffic situation manageable is the need for coordination and commitment of all responsible parties.

The CAC fully supports the preliminary mitigation plans which are being proposed by the City of Boston's Transportation Department and the Boston Redevelopment Authority, and urges that the necessary support be given to these by responsible State, Federal and Regional authorities. These include: Boston Department of Public Works; Executive Office of Transportation and Construction; Massachusetts Department of Public Works; Massport; Urban Mass Transportation Administration; Federal Highway Administration. (See attached Summary "A")

(b) The CAC further recommends that the EIR be adjusted in a manner which makes clear the full-build impact while the Seaport Access Road and Northern Avenue bridge are completed and the Third Harbor Tunnel and Central Artery Depression are incomplete by development's end.

(c) The CAC recommends that the commencement of the development be tied to funding assurances and appropriate time schedules for key mitigating measures such as the Seaport Access Road, the South Boston by-pass, and some local roadway, bridge and/or transit improvement. Although the committee realizes that the overall traffic management and transportation plan may take time to complete, some reasonable and solid commitments must be obtained.

It is critical that other development in the Fort Point Channel area be tied into this plan. Massport development of the World Trade Center and other developers must also be made to play by the rules. To exempt or exclude any other development would be grossly unfair and would make this effort completely ineffective. A public planning and review process which actively solicits community involvement will help to ensure that development in the Fort Point Channel is balanced and fair to the South Boston community.

(d) The roadway, bridge and transit improvements outlined in Attachment "A" should be prioritized, and an immediate effort to secure agreements from key decision makers should take place.

(e) Additional traffic generation is assigned to residential streets in the draft EIR, explicitly assuming that they should continue to function as arterial streets. An alternative approach should be developed for submission in the final EIR where traffic is discouraged from utilizing residential streets, specifically L Street, D Street, E Street, A Street, I Street and K Street.

(f) The specific willingness of the developer to engage in employer-sponsored access management programs should be described, e.g., transit pass subsidies, car pool encouragement, parking management, etc. A summary of such a plan should be included in the final EIR.

(g) The transit needs for the Fort Point Channel component background development are not articulated nor assigned to any distribution system. This should be addressed more adequately in the final EIR.

(h) An illustrative plan for opening the closed portion of Dorchester Avenue between Broadway and Summer Street should be developed and required in the final EIR. It has long been the position of the majority of South Boston's civic groups that this could substantially mitigate current and future traffic and truck encroachment on the residential district, particulary the West End, and could promote more effective use of the Broadway Bridge.

II. URBAN DESIGN

The Piers 1, 2, 3 and 4 CAC wishes to offer its design comments on the development plans prepared by HBC Associates and the Boston Mariner Company as illustrated in the draft EIR/S. Much progress has been made in the designs since last Spring in response to CAC critiques. These responses include: 1) reduction in the height of the residential buildings closest to the harbor; 2) redistribution of building mass from the north side to the south side of the canal; 3) introduction of two new pedestrian bridges across the canal; 4) realignment of the buildings to reinforce the canal angle and sweep of the Fan Pier edge; and 5) the welcome and sweeping reorganization of Pier 4 which has appropriately opened the active public outdoor plans to views of the lagoon and open sea. Of course, in this refinement of design, the height of the Hyatt Hotel and office buildings along Northern Avenue have increased in height.

The preparation and release of the draft EIR/EIS has provided us with valuable new information with which to evaluate the development proposals. Based on this new additional information we offer the comments below. Hopefully, to the degree possible, we have raised the design issues that still concern us in the format of performance standards to be met rather than specific dictates as to the "correct" design solution.

(a) The most convenient pedestrian access to the new harborfront park from the downtown is by means of the proposed pedestrian bridge across the canal at the mouth of the Fort Point channel. As presently designed, the approaches to this pedestrian bridge look difficult and potentially uninviting. The ease of public pedestrian access to the harborfront park from this bridge should be strengthened. Please further clarify this bridge design and provide an eye-level perspective view of this key pedestrian approach from the downtown.

(b) The actual usefulness of certain public open spaces needs clarification. Several "public" open spaces are illustrated: the canal and walk, the harborfront park and esplanade, the walk about the hotel perimeter, the breakwater esplanade, and the vehicular drop-off "plaza."

Though the canal walk, the harborfront park and breakwater esplanade are clearly useful public open spaces, the hotel and residential towers' vehicular drop-off plaza, which is large in size, seems to have no such similar public purpose. Its primary use seems to be devoted to vehicular circulation and drop-off functions with little attraction as a publicly useful open space.

Please define its public open space use more clearly and describe the ground-floor uses in the residential and hotel buildings which surround this "plaza." Please provide eye-level perspective sketches of this "plaza."

Perhaps a more useful location for a large public open space plaza and gathering space would be at the harbor side edge of the Hyatt Hotel. Please provide an eye-level sketch of what this public open space may look like.

(c) In a related matter, the draft EIR indicates that many of the proposed public open spaces are in shadow for much of the year. This is largely due to the orientation of the entire site to the north.

In order to insure that these public open spaces and canal are truly useful and inviting by allowing more sunlight, further design exploration should be pursued which diminish the impact of these shadows. Such explorations may include the alterations of building locations, the alterations of building shapes, the use of upper-floor setbacks and/or the lowering of certain building heights.

(d) There is a concern among some CAC members that a tall building, such as the Hyatt Hotel, near the water's edge is neither in the spirit of the BRA's Harborpark Guidelines nor a proper precedent to set for future harborfront building development. Recognizing that an occasional exception to the rule can be the proper strategy, the CAC nevertheless wishes the proponent to explore an alternative which pulls the Hyatt tower back from the water's edge.

(e) According to the perspective views in the EIS, the row of office buildings along Northern Avenue appears to form a formidable wall. If CC&F constructs buildings of similar height along Northern Avenue, a canyon will be formed. Please investigate design measures to reduce this impact. Perhaps setbacks, midblock penetrations through buildings, or reductions in building height should be explored.

(f) It is evident that the CC&F property will be the visual gateway from the New Northern Avenue to the entire Fan Pier and Pier 4 development. Therefore, the BRA should present its design guidelines for the CC&F property for final EIS review.

(g) The ground floor pedestrian passage through the Hyatt Hotel should be as open and inviting to the public as possible. Please explore an open air passageway rather than an enclosed one, and provide an eye-level sketch of what this open passageway may look like.

(h) Please define the need for the 16' clearance height of the pedestrian bridges across the canal as shown. Presently, these bridges require long ramps along Pittsburg and Farnsworth Streets which diminish these streets' usefulness as active pedestrian ways. However, the Fan Pier CAC acknowledges the fact that the Harborpark Committee has examined the bridge issue with regard to water-related use and urges consideration of their comments.

(i) In general, there is a sense by many CAC members that the entire development proposal is too large and that a "lesser scale" alternative should be prepared and illustrated. "Lesser scale" is a complex notion and may be defined by such various measures as lesser square footage, lesser height, and/or lesser density (FAR). When it is realized that the proposed density of the development (as measured by the FAR) is not greater than the present density of the Boston Wharf warehouse district, it becomes evident that lesser density, in and of itself, is not necessarily the issue. And cutting back the heights of all buildings by several floors, though this too would represent a "lesser scale" alternative, would probably not produce a design notably different than the present one in terms of visual or perceptual impacts.

The proponents are therefore encouraged to devise a "lesser scale" alternative that seeks to meet the performance standards of 1) diminished shadows on public open spaces, 2) more useful and accessible public open space, 3) lower buildings close to the water's edge, and 4) lessening the visual perception of high vertical building planes or walls that may make pedestrians feel uncomfortable.

III. CONSTRUCTION

The general sense of the CAC is that construction and operational issues addressed in the draft EIR lack the specificity required to develop a sound construction management plan, and the final EIR should be more specific regarding the developer's commitment to proposed mitigation measures. The draft does, however, contain many creative and innovative suggestions for mitigating construction impacts which we could support given some specific commitments from the developer.

(a) The CAC supports the recommended list of construction activities and techniques designed to mitigate construction impact. These include the Slurry Wall Foundation Construction technique, the use of pre-assembled elements, re-use of existing on-site materials, on-site disposal of dredged material and the construction of the Fan Pier Canal in the dry.

The draft mentions the consideration of "other innovative construction techniques" once design of the two projects has advanced beyond the master planning stage. The CAC recommends that some of these techniques be included in the final EIR submission.

(b) The draft states that traffic and parking issues will be manageable during construction and that truck trip impacts will be minimal since only 15 to 20 truck trips per hour will be generated. The CAC suggests a truck traffic analysis which would show where these trips will go. Is there residential area impact?

Proponents should develop and commit themselves to a specific truck traffic mitigation plan for inclusion in the final EIR. The CAC supports the proponents' willingness to investigate the use of barges in order to reduce truck traffic.

(c) The CAC would like to see more data regarding the use of car pool strategies and off-peak hour travel of construction workers in the final EIR.

(d) It is the CAC's contention that the proponents should commit to the development of traffic control plans that maintain sufficient vehicular and pedestrian capacities throughout the construction period for the portion of Northern Avenue adjacent to the sites. This traffic control plan should address residential impacts.

The CAC urges that this plan be developed as soon as possible and that it prioritize residential concerns.

(e) The CAC supports the mitigation measures presented by the proponents with regard to air quality, noise, water quality and water-related activities, and would suggest further analysis by the appropriate regulatory agencies with regard to technical points.

(f) Coordination with nearby construction projects is critical. State and City regulatory agencies must ensure that all other projects in and around the Fort Point Channel subject themselves to adequate public review and that they commit to the type of responsible planning called for in this process.

As mentioned earlier in the Transportation section, all developers including Massport must play by the rules.

IV. INFRASTRUCTURE

The EIR should require that an analysis of and commitments regarding renovation and expansion of the existing electric and gas services to serve Fan Pier/Pier 4 and the background development be garnered from Boston Edison and Boston Gas. The Fan Pier CAC's goal is to guarantee that existing levels of utility service to the South Boston community and area businesses not decrease as a result of this project.

The EIR should require the proponent to seek certification of the capacity of the water supply system to fight high rise fires, specifically pressure and volume capacities, from the Boston Water and Sewer Commission and the Boston Fire Department.

V. PUBLIC BENEFITS

A significant goal of the Fan Pier/Pier 4 Advisory Committee is to see that the general public, Boston residents and South Boston residents, receive some fair share of the benefits which will result as this development occurs. Further the CAC has and will continue to seek commitments from developers and City, State and Regional authorities which are designed to meet this goal.

Although we understand the public benefits as described herein must be negotiated with parties such as the Boston Redevelopment Authority, the developer, the Mayor, etc., and are not necessarily going to be considered in the MEPA review, we put our statements forward as an indicator of our deep commitment to this goal.

(a) The Fan Pier/Pier 4 CAC has requested that a Nieghborhood Traffic Study be done for South Boston. The Commissioner of Boston's Transportation Department has committed to undertaking this effort. The developer has pledged financial support for this endeavor.

The CAC will recommend that a South Boston Traffic Advisory Committee be established to work with the Transportation Department. This committee should be made up of representatives of established local civic organizations and involved parties such as Massport, the Economic Development and Industrial Commission, the Metropolitan District Commission, and the MBTA. Representatives from each of these groups will be urged to cooperate in this effort.

(b) Job commitments should be negotiated with the developers. Employment opportunities are a clear way of sharing development benefits. Although the Boston Jobs policies address the goal of sharing opportunities with city residents, the Fan Pier CAC recommends a 25% commitment be made on construction and permanent jobs to the local community (South Boston residents).

(c) The CAC further recommends that job training programs which would prepare residents to take advantage of negotiated opportunities be supported by all appropriate parties.

(d) The CAC recommends that retail opportunities be negotiated for local small business persons and some portion of these opportunities be set aside for small local businesses.

(e) The CAC recommends that the appropriate authorities within the City government review and develop a linkage payment distribution plan and that all necessary consideration be given to a plan which assures that the majority of linkage funds benefit the impacted community.

Given that the proposed development will have significant impact and that a potential result of the development could be the creation of increased pressure on the impacted area's housing market, linkage funds for local housing would be a mitigating measure which the community could reasonably expect.

(f) The CAC felt that serious consideration be given to planning with regard to an additional 10% for aesthetic beautification of the South Boston neighborhood.

CONCLUSION

As evidenced by the work of this committee, the community, interested environmental and business groups are willing to work in a responsible planning process with City and State agencies and developers.

To promote a responsible process all parties must take these statements and subsequent discussions and deliberations very seriously and must follow through with action that speaks to their commitment.

The Fan Pier/Pier Four Community Advisory Committee will continue to work in a coordinated manner with the Harborpark Advisory Committee, the Mayor, the Boston Redevelopment Authority and all relevant City and State agencies.

It is our hope that by working together we may see to it that future development in Boston proceeds in a responsible manner and that the benefits of this development are shared by all our citizens.

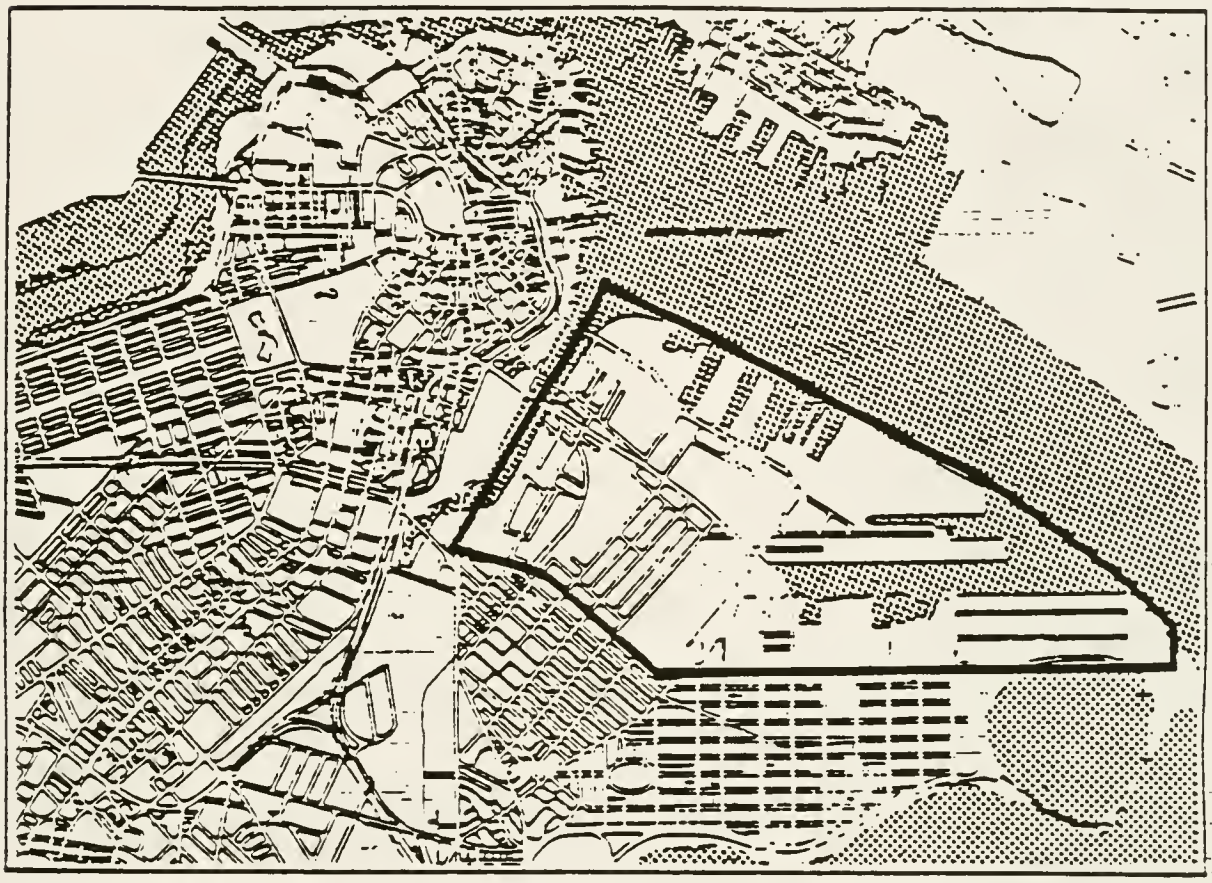
On behalf of the Fan Pier Citizen Advisory Committee, I remain,

Sincerely,

Lawrence Dwyer
Chairperson
Fan Pier Citizen Advisory Committee

cc: Raymond L. Flynn, Mayor
Stephen Coyle, Director, Boston Redevelopment Authority
Boston Redevelopment Authority Board
Fan Pier Citizen Advisory Committee
Harborpark Advisory Committee

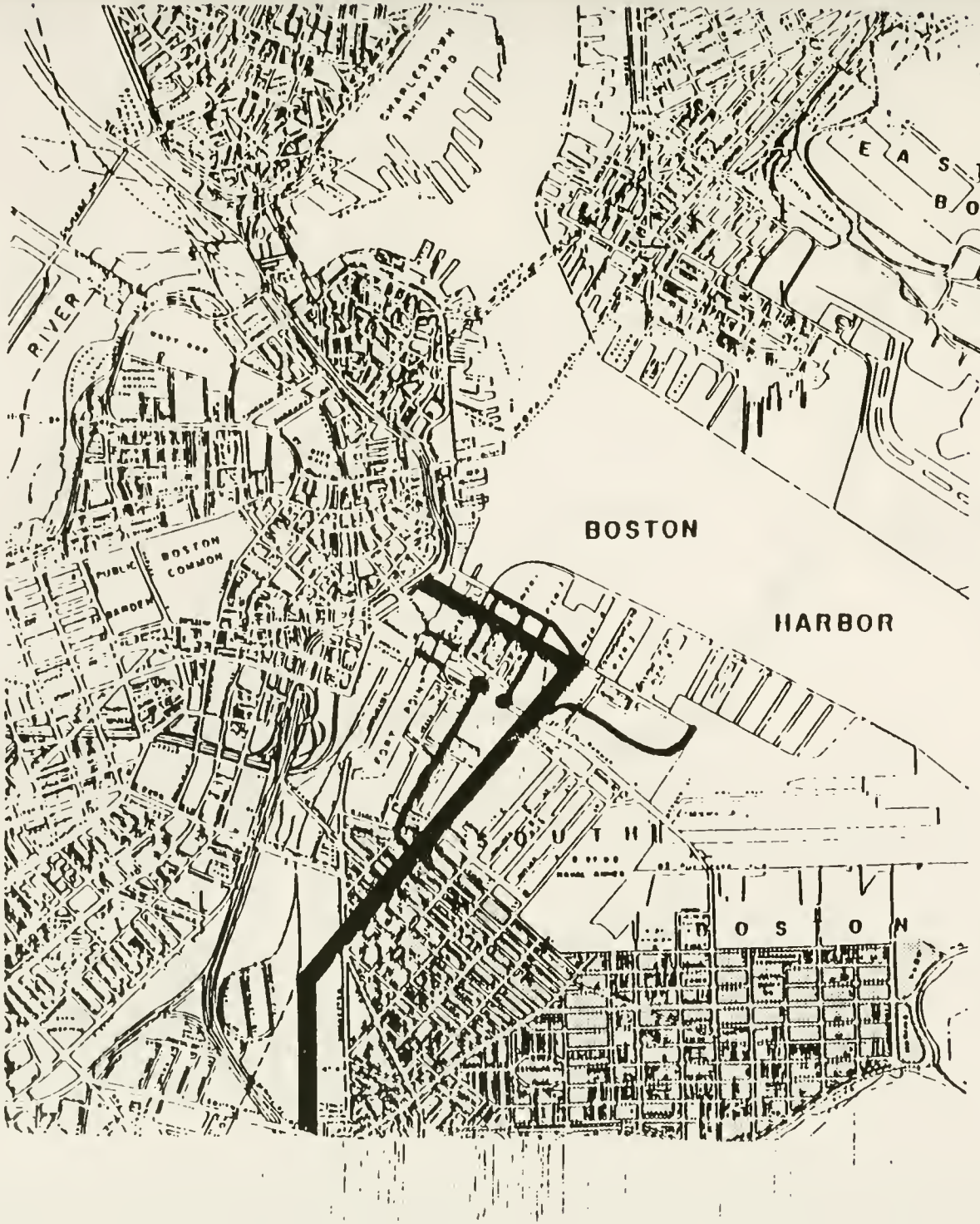
FLYNN GOAL:
MASS TRANSIT AND BETTER BRIDGES AND ROADS

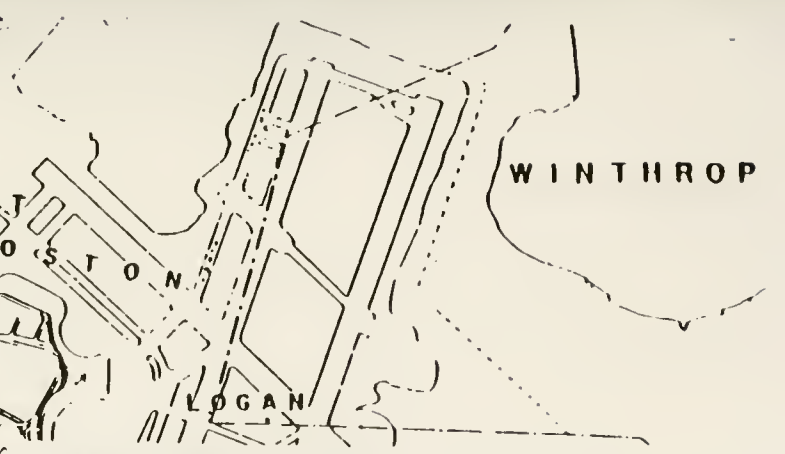


Fort Point Channel

TRANSIT NEEDS AND OPPORTUNITIES

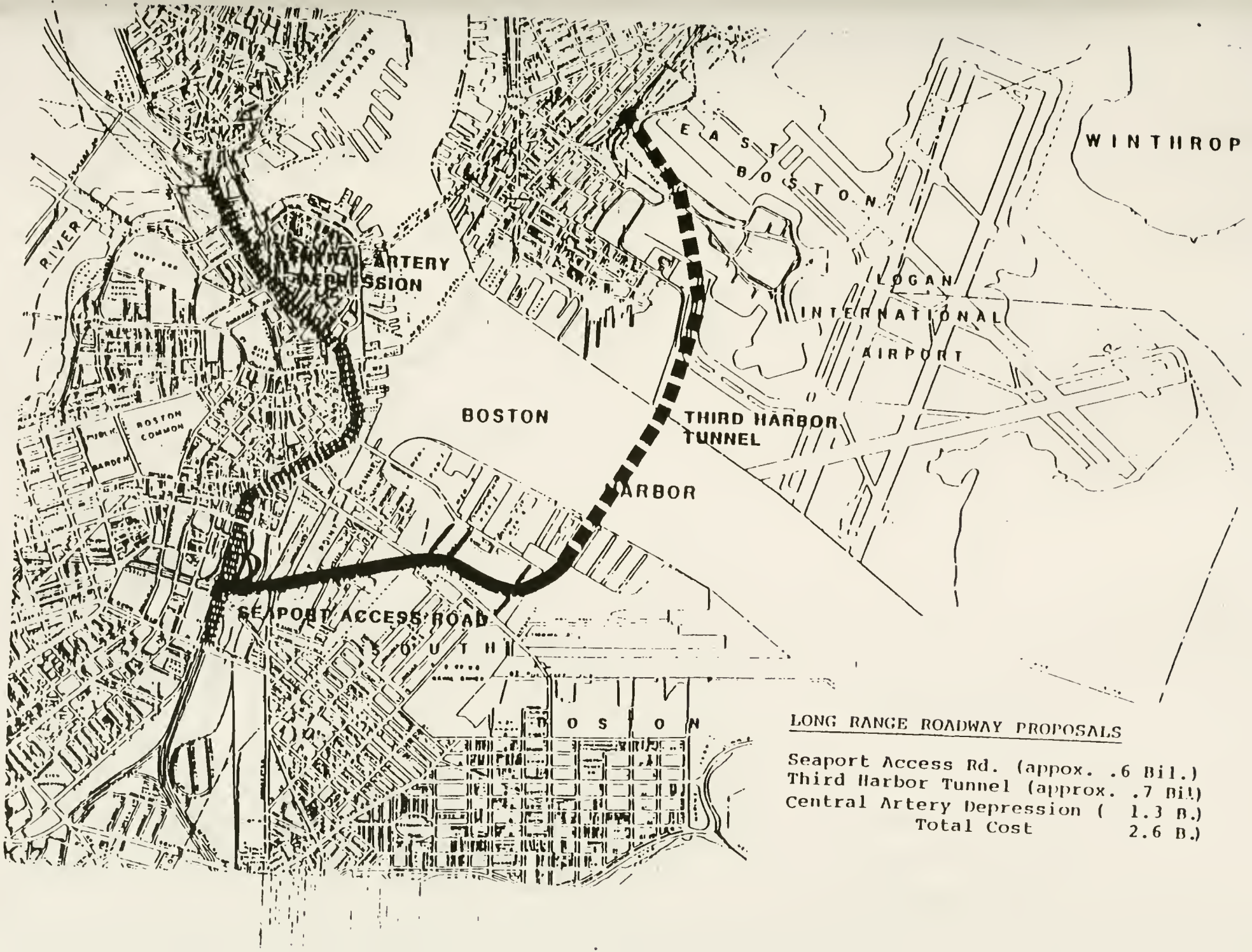
	TRANSIT	ROADWAYS
By 1990		
	* MBTA red line platform lenghtening/capacity increases	* Haul Road
		* Neighborhood Traffic Improvements
	* Shuttle buses to development sites	* New/upgraded signals - Harbor & Summer - 'D' & W. Seventh - Dorchester Ave. & Fr. Anthony Sonjin Way & Maj. O'Connor Way - 'E' & West Third - E. Eighth & 'L" - L & Fifth Street
		* Repaving A Street
		* Congress St. Bridge
		* Summer St. Bridges
		* New N. Avenue Bridge
		* New N. Avenue, Sleeper Street, and Seaport Access Connector between New/Old N. Avenues
	— —	* W. 4th, 5th, 6th, Street Bridges
By 1995		
	* South Station Intermodal Facility	* Connector Roads - Pittsburgh Street, Farnsworth Street, & Old N. Ave.
	* Red Line Loop	* Seaport Access Connector Roads
		* South Boston Bypass
	* People Mover	* Seaport Access Roadway
By 1995+		
	* Blue Line Connector to Airport	* Third Harbor Tunnel
		* Central Artery Depression





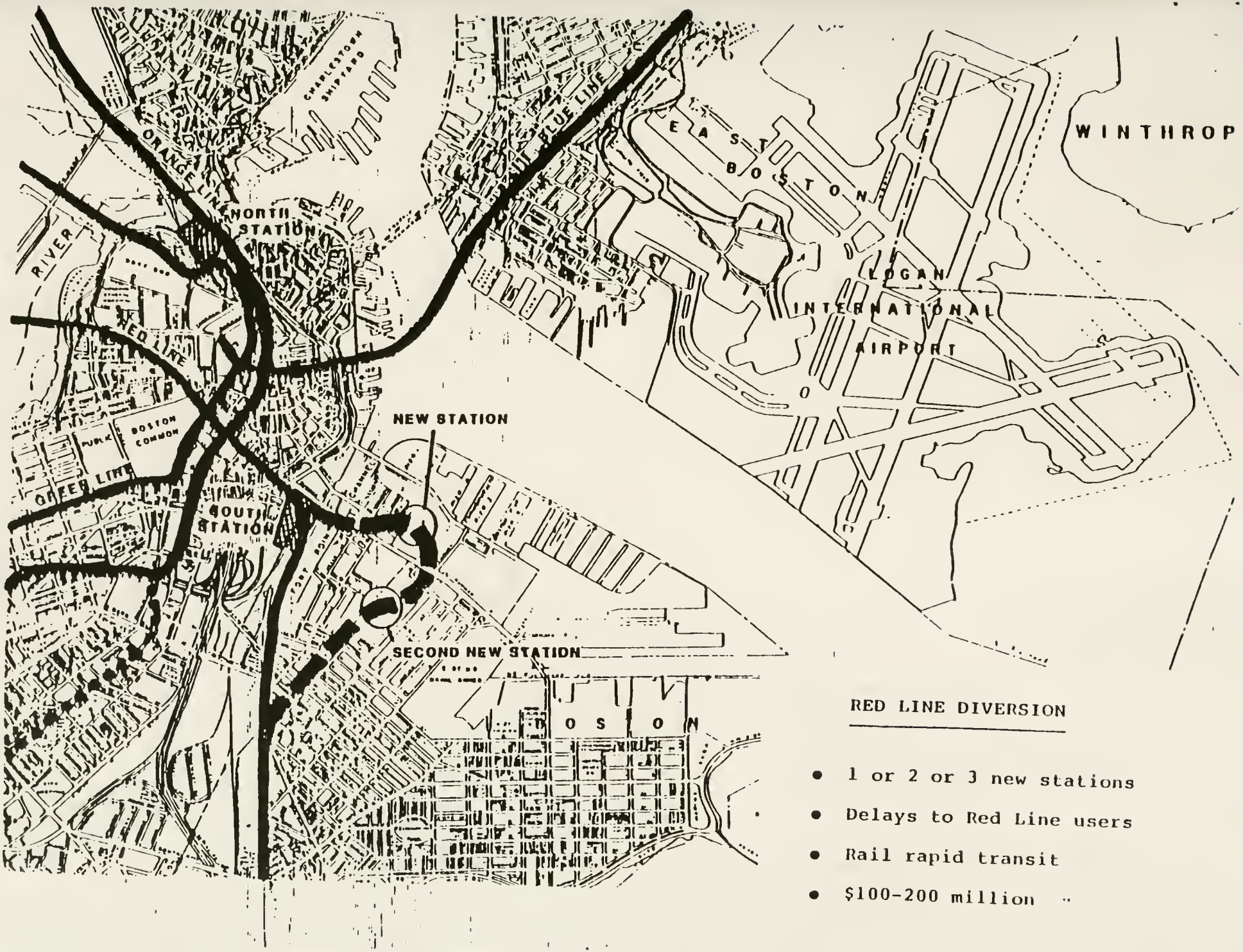
SHORT RANGE ROADWAY PROPOSALS

*Haul Road
*Neighborhood Traffic Improvements
*New/upgraded signals
 -Harbor + Summer
 -"D" + West Seventh
 -Dorchester Ave. + Fr. Anthony Songer Way + Maj. O'Connor Way
 -"E" + West Third
 - East Eight + L
 - L + Fifth Street
*Repaving "A" Street
 Rehab /Reconst.
 -Congress Street Bridge
 -Rehab/Reconst. Summer Street Bridges
 -Rehab/Reconst West 4th/5th/6th Street Bridges
*New Northern Avenue Bridge
*Relocated (new) Northern Avenue, Sleeper Street and Seaport Access Connector between new + old Northern Avenue
*Connector Roads
 -Pittsburgh Street, Fransworth Street, and old Northern Avenue
*Seaport Access Connector Roads
*South Boston By-pass



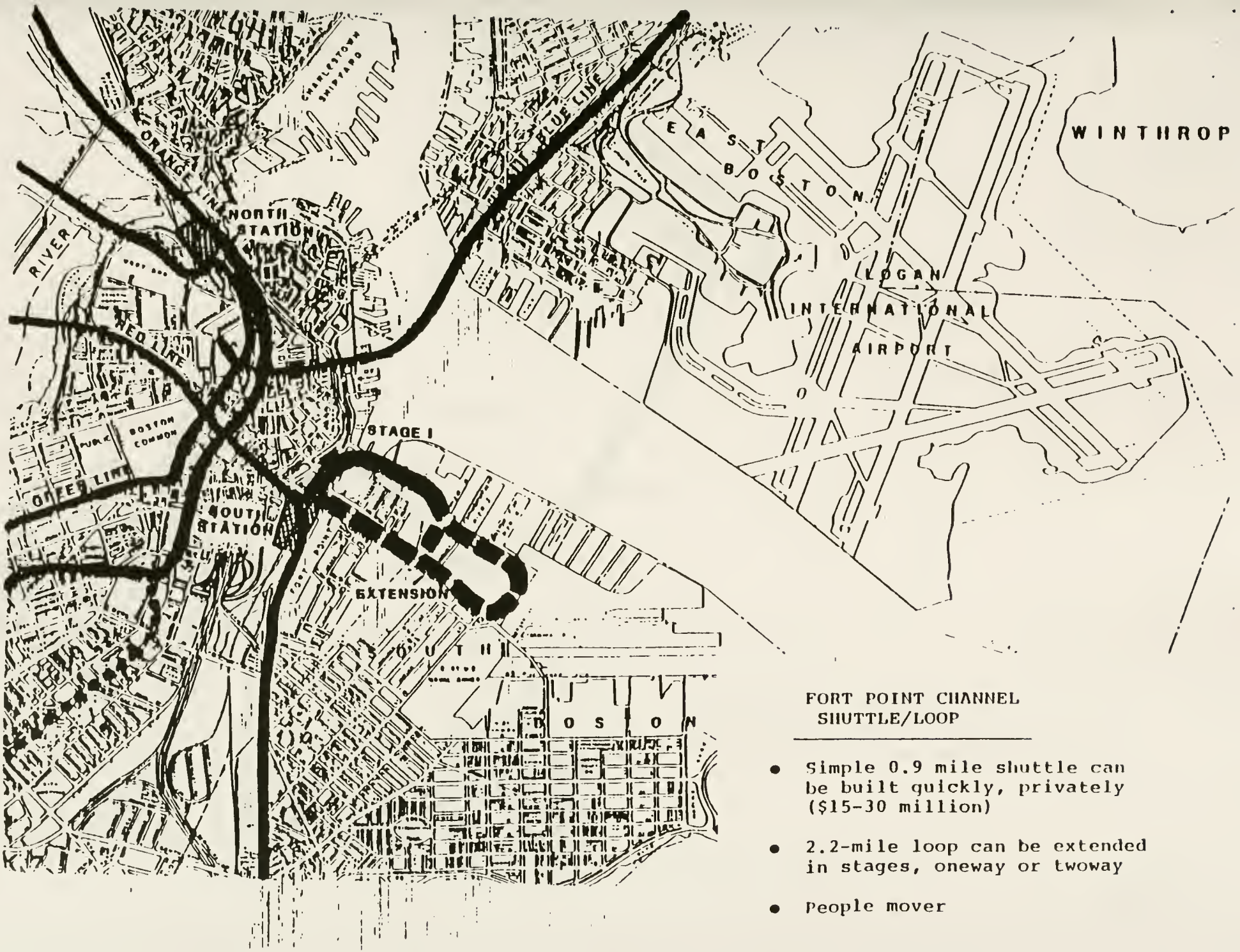
LONG RANGE ROADWAY PROPOSALS

Seaport Access Rd. (appox.	.6 Bil.)
Third Harbor Tunnel (approx.	.7 Bil)
Central Artery Depression (	1.3 B.)
Total Cost	2.6 B.)



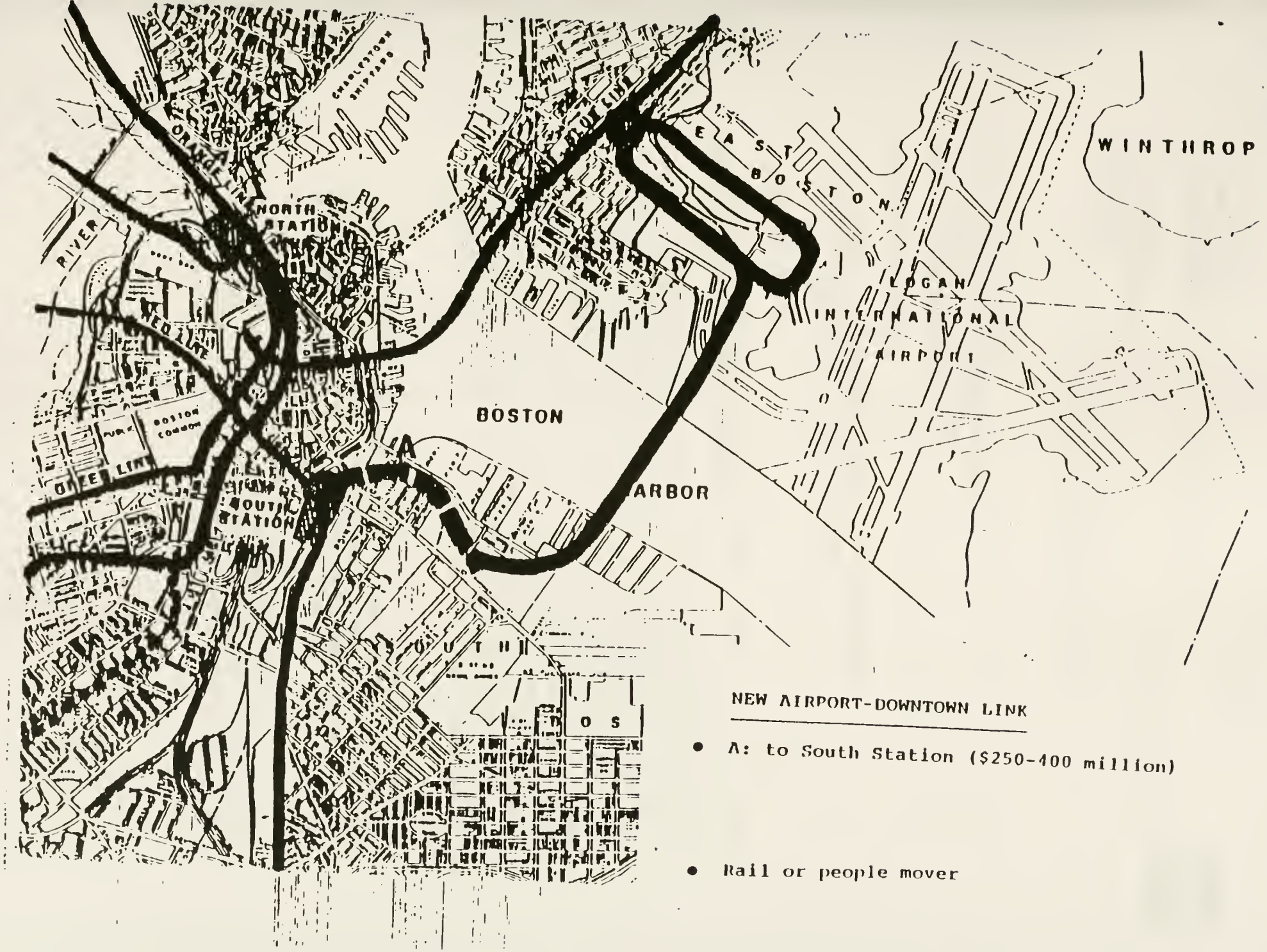
RED LINE DIVERSION

- 1 or 2 or 3 new stations
- Delays to Red Line users
- Rail rapid transit
- $100-200 million



FORT POINT CHANNEL
SHUTTLE/LOOP

- Simple 0.9 mile shuttle can be built quickly, privately ($15-30 million)
- 2.2-mile loop can be extended in stages, oneway or twoway
- People mover



NEW AIRPORT-DOWNTOWN LINK

- A: to South Station ($250-400 million)

- Rail or people mover

Boston Water and Sewer Commission

10 Post Office Square
Boston, Massachusetts 02109
617-426-6046

MEPA

RECEIVED

JAN 24 1986

RECEIVED

OFFICE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS

January 22, 1986

Secretary James S. Hoyte
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor
Boston, Massachusetts 02202

Attention: MEPA Unit

RE: Draft Environmental Impact Report - EOEA #4426/4584
Fan Pier Development/ Pier 4 Development

Dear Secretary Hoyte:

In regard to the above-referenced project, the Boston Water and Sewer Commission has the following comments:

1. The report indicated that portions of the existing 15-inch and 18-inch sewers would experience surcharging under conditions when all future developments (year 1995) are generating peak sanitary flows. Consequently, BWSC is currently studying the adequacy of of the sewerage system in Northern Avenue to accomodate the indicated wastewater flows for the year 1995. The purpose of this study will be to investigate the extent and impact of the apparent surcharge condition and to determine any remedial measures which may be required in order for the sewerage system to properly handle such wastewater flows. The anticipated date for the issuance of the final Environmental Impact Report is May 1986 by which time BWSC will have completed its investigation and made known its findings.

2. The completion date for the new 18-inch sewer from Viaduct Street to Trilling Way and the 30-inch sewer from Trilling Way to the Pump Station has been revised from December 1985 to March 1986 and the completion date for the construction of the Pump Station has been revised from February 1986 to June 1986.

3. The Boston Wastewater Facilities Plans prepared for BWSC indicated that excessive sediment has accumulated in the South Boston Interceptor. Therefore, to restore the interceptor to its intended capacity, BWSC is planning to have this sewer cleaned beginning in the summer of 1986.

4. BWSC presently does not own any storm drain facilities along Northern Avenue, although it does maintain the catch basins in this area. The future reconstruction of Northern Avenue will necessitate the construction of a new drainage system by the developers or others which will be subsequently owned and maintained by BWSC.

5. The proposed wet well systems for the Fan Pier and Pier 4 developments will need to be further detailed as part of the site plan preparation. The use of these systems or the need for the construction of other systems by the proponent will be evaluated at that time. Currently, BWSC does not allow the installation of permanent holding tanks but requires developers to evaluate other systems including new pipe lines to meet required capabilities.

6. The stated water demand and sewage flow figures do not indicate whether water for air conditioning purposes has been included. These figures should represent all anticipated water demand requirements for the developments and the corresponding wastewater flows which result from these requirements.

7. Improvements being made to the water and sewer systems in the South Boston area have necessitated the shutting down of water distribution mains and consequently have prevented the making of accurate hydrant discharge tests in the subject development area. Therefore, new hydrant discharge tests need to be made to assure that the Pier 4 and Fan Pier developments can be adequately supplied and protected by the existing and proposed water systems. Such testing should be coordinated with BWSC.

8. All plans for the proposed developments shall be coordinated with BWSC to assure compliance with BWSC regulations.

Very truly yours,

Charles Button

Charles Button, P.E.
Chief Engineer

CB/ED/gf

LAW OFFICES OF
RAPPAPORT AND RAKOV

JEROME LYLE RAPPAPORT
JANET F. ASERKOFF
JAMES WYANT RAPPAPORT

ONE LONGFELLOW PLACE
BOSTON, MA 02114
(617) 227-7345

January 22, 1986

RECEIVED
JAN 22 1986
OFFICE OF THE SECRETARY OF
ENVIRONMENTAL AFFAIRS

Honorable James S. Hoyte, Secretary
Executive Office of Environmental Affairs
Commonwealth of Massachusetts
100 Cambridge Street, 20th Floor
Boston, Massachusetts 02202

Re: Fan Pier - Pier 4
EOEA # 4426/4584

Dear Secretary Hoyte:

This office represents New England Seafood Center, Inc. New England Seafood Center, a cooperative corporation of fish processors and dealers in the City of Boston, owns the property at 145 Northern Avenue which is directly across the street from Pier 4. The members of the Seafood Center are companies which had to move off of Atlantic Avenue to make way for the Waterfront Urban Renewal Project. Their present location was obtained, after consultation with the City, because of its proximity to the Fish Pier and its good road access to and from the downtown.

These companies do not look forward to being injured by the Fan Pier-Pier 4 Project, but they shall be severely impacted if the project goes forward as set forth in the Draft EIR because of the severe negative impacts the project will have on Northern Avenue. If the fish businesses are to remain in their present locations, which is proximate to the Fish Pier, the road plans quite simply must be adjusted to permit access to and from the land on the south side of Northern Avenue onto Northern Avenue itself, and the project must be made much smaller to reduce the traffic impact.

The Draft EIR details that a very large parcel of land on the south side of Northern Avenue next to the Seafood Center is now vacant. The Fan Pier-Pier 4 Project as planned is too high and too dense. It will both overload the traffic capacity, and eliminate the vast majority of views of the harbor from the south side of the street. The effect is thus to preclude the improved use of all of the vacant land and the changed use of the Seafood Center's property.

Development of the Fan Pier-Pier 4 is certainly desirable; but, the intensity of the project has to be reduced, the traffic impacts of the project have to be lessened and road access to land on the south side of Northern Avenue has to be improved if the development is to benefit the City as a whole rather than become a monument on the harbor creating a wasteland at its back.

The fish dealers by moving to their present location have been part of the regeneration of Boston. They request that you require substantial reconsideration of the Fan Pier-Pier 4 project to reduce its size and density, and to improve access to the south side of Northern Avenue so as to mitigate the negative traffic and other environmental impacts of the Project.

Very truly yours,

RAPPAPORT AND RAKOV

Janet F. Aserkoff
Attorneys for
New England Seafood Center

JFA/aeh

Delivery by Hand

BOSTON DISTRICT COUNCIL OF CARPENTERS, AFL-CIO

United Brotherhood of Carpenters and Joiners of America

ANDRIS J. SILINS
SEC.-TREAS.-GENERAL AGENT

TELEPHONE (617) 542-2334

347 CONGRESS STREET, BOSTON, MASSACHUSETTS 02210

January 22, 1986

RECEIVED

JAN 23 1986

OFFICE OF THE SECRETARY OF
ENVIRONMENTAL AFFAIRS

James S. Hoyte, Secretary
The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Dear Secretary Hoyte:

I have reviewed the Draft Environmental Impact Report (EOEA #4426/4584) for the Fan Pier and Pier 4 Developments. The trades have became concerned about the future of Boston's economy and the future of office and other growth. It is clear to us that, in order for Boston's downtown to continue its growth, the borders of the downtown must be extended. The Fan Pier and Pier 4 developments are terribly important in that they provide an opportunity to continue downtown growth without further exacerbating the traffic and infrastructure problems associated with additional construction within the current borders of downtown. By developing these sites, across the Fort Point Channel, the opportunities for solving traffic and infrastructure problems will be far greater than they would be within the existing downtown.

Since many of our union members are South Boston residents, we have long been concerned about traffic problems in the community. Even though the Fan Pier and Pier 4 developments will be a small part of the overall traffic problem, we are hopeful that the focus on traffic issues, brought about by their proposed development, will result in solutions to long-standing traffic and transportation problems in South Boston.

For the sake of the region's economy, we hope that this project goes forward. The developments propose a responsible mix of uses to meet the needs of a growing economy, and provide a unique opportunity to solve problems that can no longer be solved within the existing confines of Boston's downtown.

Sincerely,

Andris J. Silins

Andris J. Silins
General Agent
Boston, C.D.C.

AJS/jmm

The Commonwealth of Massachusetts

Executive Office of Transportation & Construction

Office of the Secretary

10 Park Plaza, Room 3510

Boston, MA 02116-3969

Michael S. Dukakis
Governor

Frederick P. Salvucci
Secretary
and
MBTA Chairman

DATE: January 23, 1986

PROJECT PROPONENT: ANTHONY'S PIER 4 Inc. Anthony Athanas, President

PROJECT DESCRIPTION: FAN PIERS/ PIER 4, NORTHERN AVENUE, BOSTON, MA

DATE RECEIVED BY E.O.T.C. _____

COMMENTS ON PROPOSED PROJECT:

( ) NO COMMENTS

(x) COMMENTS

RECEIVED

JAN 28 1986

OFFICE OF THE SECRETARY OF
ENVIRONMENTAL AFFAIRS

DATE: January 23, 1986

Frederick P. Salvucci
Secretary

The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Quality Engineering
Division of Air Quality Control
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Commissioner

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M E M O R A N D U M

TO: EOEA

ATTN: Steve C. Davis, MEPA Unit

FROM: Michael J. Maher, Air Quality Section Chief

DATE: January 24, 1986

SUBJECT: EOEA #4426/4584 - Fan Pier/Pier 4 Development Project Boston, Review of the Draft Environmental Impact Report

This office has received the Draft Environmental Report (DEIR) prepared for the above referenced project. Based upon a review by DAQC staff, we offer the following comments:

1. The Final should include documentation of all modeling methodology used in determining carbon monoxide concentrations at proposed intersections, including Caline 3 worksheets, inputs and a sample Mobile 3 run.

2. Section 1V, p 1-11 states "Levels of Service 'A' through 'D' are generally considered acceptable". Levels of Service 'A' through 'C' is the acceptable range. The Final should include analysis of applicable intersections in the event any were omitted due to this error.

3. The proposed recommendation of adding a third westbound lane for New Northern Avenue to minimize air quality impacts at the intersection of New Northern Avenue and Seaport Access Road contradicts the mitigation measure prepared for New Northern Avenue and Sleeper Street. This difference should be clarified in the Final.

4. The 1-hour and 8-hour CO concentrations shown in Table 2-9 in Section IV. 2-26 appear to be an error since the concentrations presented are below established backround concentrations. The Final should address this apparent discrepancy.

5. The Final should include the net difference in number of commercial and non-commercial parking spaces displaced by the project and added by the project.

Should you have any questions regarding this memorandum, please contact Jerome Grafe at 292-5703.

JG:dep

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and
M.B.T.A. Chairman

Comments of the Executive Office of Transportation and Construction on the Draft EIR for the Fan Pier Development and the Pier 4 Development

Submitted January, 23, 1986

General Observation

The authors of the Draft EIR as well as the responsible agencies who established its broad scope, are to be congratulated for the creation of document which attempts to define the comprehensive environmental impacts of an entirely new extension of the downtown. In particular the breakout between "background growth" and project impacts allows the proponents to explain the particular impacts of the proposed action in the context of many similar actions, which may or may not have been subjected to such environmental scrutiny. EOEA and MEPA staff are to be congratulated for their insistence upon an analysis of the cumulative effects of many separate public and private decisions. One might well argue that, in the future, this form of cumulative, or aggregate analysis of growth would most effectively be undertaken by a public planning agency, and not be left as the burden of individual private project proponents. In the meantime, publication of this joint- developer DEIR represents a significant milestone in the environmental analysis of public policy directions.

Finally, it should be noted that like many other waterfront developments the proposed projects will be constructed on lands that at one time clearly belonged to the Commonwealth and its people. The particular history of land transfers is well summarized in section V. It is important to reinforce that all parties have agreed in principle that the basic tenets of the Chapter 91 permitting process should and do apply in this major case. This Office takes seriously the concept that the development of this tide land area must be rigorously scrutinized for its consistency with true public purpose - public purpose which goes beyond the limited perspective of access to and use of water.

Even within the context of the DEIR's pathbreaking role in documenting a major city planning process, the document has several serious flaws must be addressed by the EOEA before the acceptance of the FEIR at a later date.

Nomenclature and Definitions

The consistent use of the phrase "Reduced Scale Alternative" to describe the new Pier 4 Alternative design is unacceptable and very misleading. The title "Pier 4 Lesser Scale Alternative" is used throughout the book; The "Pier 4 Lesser Scale Alternative" is discussed in chapter V on pages I.50, I.51, I.53, I.50 through I.57, and on pages 2-8. 3-17. 5-9. In each case, the project is described as the "Lesser Scale Alternative". Nowhere on any of these pages is any discussion of how much smaller this program is than the initial master plan. Within the entire EIR, only on page III-15 is it stated....

> "The resulting Lesser-Scale Alternative.....
> will accommodate the same uses and total square footage as the Initial Proposal....."

In short, the Pier 4 Lesser-Scale Alternative (which has buildings considerably higher than the Initial Proposal) is not of lesser scale than the initial proposed. In fact the square footage of the revised scheme is unchanged from the initial proposal.

The use of the phrase "Lesser Scale Alternative" to describe the full project, including the Fan Piers, is technically not deceptive because the newer design is in fact 2.7% smaller in total square foot than the initial program. While a reduction in program did occur, a less than 3% decrease in square footage in a project to build the equivalent of 5 new Prudential Towers is hardly a major "lessening" of scale from the original proposal. Quick examination of the 18 excellent, computer-generated view renderings reveals not one single instance where the "reduced scale" alternative appears to be smaller than the initial plan. In virtually every case, the "reduced scale" alternative can be observed as the one with the taller buildings.

The project proponents and their document preparers should drop this misleading terminology and use a less judgmental phrase, such as "revised architectural concept" for the newer scheme. In any case, Secretary Hoyte must make a determination as to whether the proponent has fully complied with the responsibility to examine "Major Development Alternatives" by presenting a discussion of two programs which are different by less than 3% of program mass.

Comments Concerning Public Transportation

The most important conclusion that must be drawn from the DEIR is that there exists a serious gap between the assumptions

made about public transportation usage, and the lack of any specifically proposed services to bring about that usage. The DEIR has some significant problems in its treatment of public transportation volumes, and the manner in which they are generated. The DEIR addresses the issue of public transportation by devoting an extensive discussion to the adequacy of system capacity. In general, this section is well written and it concludes quite accurately that the MBTA is in the middle of one of the most concentrated programs to increase capacity of any system in the country. The data is summarized well and suggests that further attention may need to be paid to the Blue Line beyond current public commitments.

However, like so many studies of rail rapid transit, the DEIR totally misses the mark by defining the problem as that of accommodating the new riders to the system, instead of the real question, how do you attract new riders to the system. The DEIR reaches this point through the back door by first assuming a financial district-type mode split, then calculating the left over auto users who will not find adequate parking space, and then adding the two together. Left out completely is a demand-based analysis of what level of service characteristics have to be provided to bring about a financial district-type mode split in the first place.

This is not necessarily to argue that the burden of regional or even sub-area transportation planning should lie with the private developer preparing an EIR. Rather, the proponent should be commended for presenting in one document the facts concerning this area-wide pattern of development, in a manner which so dramatically points out the need for new public transportation infrastructure in this area, if densities approaching the proposal are to be accepted.

On January 15th the Mayor sent a letter to this Office requesting that the State devote its resources and those of its operating agencies and authorities to the study of public transportation alternatives for this area with the close participation of the City of Boston Transportation Department, as proposed by the Mayor. EOTC will undertake such a study immediately. During the course of this study, it will become clear what level of investment in public transportation infrastructure is appropriate in this area, and to what extent the private developers should share in its cost, or in the cost of later operations. It will also become clear to what degree an appropriate level of transportation is capable of producing the mode splits relied upon in the analysis contained in the Draft EIR. The Secretary of EOEA should ensure that the Final EIR accurately reflects the level of information about these alternatives.

Comments Concerning Highway Transportation

Definition of the I-90/I-93 Project

The DEIR makes a major mistake in nomenclature by referring to the project depress/widen the Central Artery and build a third Harbor Tunnel as "The Third Harbor Tunnel Project". The project can be referred to as the I-90/I-93 Project, or the CA/THT Project, but it is highly misleading to refer to this project to build two new critical highways by the name of one of them. References to the "The Third harbor Tunnel" exist throughout the analysis, but only on page IV.1-39 is the term Third Harbor Tunnel ever defined:

> "The 1995 scenario with the Tunnel was based on Alternative 5A Modified of the Central Artery/ Third Harbor Tunnel and included the Harbor Tunnel itself, the Seaport Access Road through South Boston and the Depressed Central Artery through downtown Boston."

This serious problem in nomenclature may stem quite innocently from the timing of the original EOEA Certificate of "Combined Scope" in January of 1983, when the proposed major highway project in the area was a Third Harbor Tunnel (without any Seaport Access Road service characteristics). Thus, in spite of the fact the preparers completely (and accurately) revised their highway networks to reflect the existence of both the widened/depressed artery and the totally revised Seaport Access alignment tunnel, they left the nomenclature of the project to a term relevant at the time of the 1982-83 scoping process. The result is highly misleading, and some cases just does not make sense. For example, it is reported on page IV.I-102 that any relief from project related growth at the intersection of Atlantic and High "requires the Third Harbor Tunnel" Without the I-90/I-93 Project the V/C ratio will be 1.15; with the I-90/I-93 Project the V/C ratio will fall to an acceptable .61. This vast improvement stems from:

1. capacity improvement on the widened Artery, and

2. a series of at grade cross streets at Pearl and Oliver Streets made possible by the depression of the Artery.

The analysis is correct, and well done. the nomenclature - the referring to these improvements as "The Third Harbor Crossing" is highly misleading: no tunnel-only option could ever offer such mitigation features at this critical location.

Relationship to the I-90/I-93 Project

The DEIR, (largely because of the misnaming of Artery/Tunnel Project) appears to give the impression that the construction of

a Seaport Access alignment tunnel is all that is needed to make the core-area expressway system deal with the impending Northern Area development growth. This implication is inaccurate and must be corrected. Nearly one third of the Fort Point Channel development traffic is oriented to the North and Northwest, and this third of the problem is also highly serious - particularly in the Northern Avenue/Atlantic Avenue/High Street/Purchase Street/Congress Street one way loop intersection system. These traffic impacts occur at a particularly sensitive and vulnerable point the region's highway system, and should not be down played.

The DEIR reports that the Pier 4 and Fan Pier projects alone (no "background growth") would generate a demand for 18,000 vehicle trips per day (Table IV.I-15). This is based upon both an initially optimistic assumption of transit usage, and a further adjustment to decrease auto usage even further. CTPS forecasts show that about 70% of these vehicles are going in directions best served by the Seaport Access Alignment Tunnel, while 30% are going generally North and Northwest using the Artery or its parallel routes. Thirty percent of 18,000 is 5,400 new vehicle trips from these two projects alone projected to use the congested Artery facilities.

At the present time, the Central Artery carries about 175,000 vehicles per day. The facility is plagued by a breakdown condition in the evening rush hour that lasts from 3PM to 8PM. The ability of the existing facility to absorb these 5,400 trips must be questioned: the situation resulting from the added growth of the general area is even more disconcerting.

The DEIR presents the picture of a development area (generally to the South of the Fort Point Channel) where an additional 50,000 daily vehicle trips are expected, of which about 18,000 are generated by the proponents' projects. These same 70% come from directions best served by the proposed Seaport Access Alignment Tunnel, and about 30% would come and go through the Central Artery corridor. The DEIS could be misinterpreted to mean that this level of development could be adequately handled by a highway solution which built a new tunnel but did not provide for significant increases in capacity along the Central Artery. It is true that the Seaport Access Alignment Tunnel was specifically designed to provide a badly needed by-pass of the South Boston community, which in turn allows development plans such as this to proceed. It should in addition be very clear that reconstruction of the Central Artery is also essential.

Of the projected 50,000 vehicle trips from this area, some 15,000 additional trips can be expected to cross the Fort Point Channel, mainly at Northern Avenue and Congress Street. Most of these trips are destined for the North, and Northwestern Corridors, and the CBD itself. To suggest that the Central Artery - which today is the single most congested interstate highway in the country - can adequately process these additional 15,000 vehicle trips would be totally misleading.

For some period (before the I-90/I-93 EIS), there was a belief that a Third Harbor Tunnel alone would provide relief to traffic flow on the Central Artery. However, the EIS process for the I-90/I-93 Project showed that traffic at the major queue-generating choke point would not be lowered by the addition of a tunnel-only project. The EIS process for the I-90/I-93 Project clearly shows that in 1990, volumes at the entrance point of the Northern Avenue on-ramp would still be greater than present levels, with a tunnel-only scheme. In short, the EIS process showed conclusively that even with the addition of a tunnel, the back up queue caused by the Artery which presently destroys the Northern Avenue/Atlantic Avenue intersection would be worse in the future than it is today.

Similar summary observations can be made about the peak hour flow. The Fan Pier/Pier 4 DEIR warns of an overall growth of about 7,500 new vehicle trips in the PM peak hour, of which more than 2,000 would be dependent on the Central Artery corridor. The DEIR reports that even with the construction of the Seaport Access Alignment Tunnel - volumes on the Northern Avenue Bridge will increase by more than 1,000 PM peak hour vehicles over the present volumes. To send an additional 1,000 vehicles during the PM peak hour through the existing Atlantic Avenue/Northern Avenue/Central Artery ramp intersection implies massive back up queues in all directions. The present Artery is at capacity now, and is expected to remain so: the resulting back up queues would make the intersection totally unmanageable. However, when the Artery is reconstructed from its present six lanes to its proposed eleven lanes in this section, the expressway system will indeed be able to accommodate the projected growth in demand.

The text of the DEIS should be restructured to make clear that the expected growth in vehicle travel requires additional highway capacity along both the Seaport access Tunnel Corridor (E-W) and along the Central Artery corridor. The Secretary of EOEA must decide the extent to which the Fort Point Channel development process should be continued before the actual implementation of the necessary transportation infrastructure facilities.

Roadway Facilities as Mitigation Measures

In general, the DEIR does a superb job in explaining the impact of the expected development pattern on the need for immediate implementation of the major highway facilities proposed by the State, particularly the I-90/I-93 Project. The discussions of the need for the I-90/I-93 Project to mitigate project impacts are well presented. In terms of air quality, the I-90/I-93 project is described as "a significant and far reaching mitigating measure for air quality impacts." Assuming the full build of the piers projects the I-90/I-93 Project will reduce the number of failing (LOS E-F) intersections from 16 to 8 fewer, in fact than in the scenario without the piers projects and without the I-90/I-93 Project (Page IV.2-8, Table IV.I-27). The well

displayed Tables IV I-15 and IV I-26 show the remarkable fact that with both the I-90/I-93 Project and Fan Pier/Pier 4 there is virtually no deterioration in intersection LOS at any existing intersection. These clear summary tables are rare in a project-specific DEIR such as this, and the proponents are to be commended for the clear presentation of inter-dependence between these public and private investments.

Concerning the use of local streets as mitigation measures, the document is somewhat less creative. We feel it is the responsibility of the City of Boston to respond to concepts such as the removal of local parking from L-Street and other South Boston neighborhood streets. We assume the City shall not accept such project mitigation measures in the neighborhoods.

The proposed use of the "railroad cut" as a significant right-of-way requires more examination by the State and the City. For the moment, we suggest that it not be assumed that this right-of-way is available for general purpose private travel. The right of way is a major resource which must be examined in light of such proposals as a Red Line arching loop from Broadway to South Station. Given the known environmental sensitivity of the alignment, and given the conflicting proposals for use of the right-of-way, we do not believe that an access roadway in this area should be accepted as part of an assumed mitigation package.

The same general comment should be applied to the DEIR's propensity to recommend that proposed local streets in the area be widened further. We shall only respond that the width of a road, such as relocated Northern Avenue, must be determined after inclusion of many factors, such as urban design, landscape design, analyses of pedestrian needs - all in addition to level-of-service analysis by traffic engineering. This Office is highly pleased with the leadership being exerted in this area by the BRA and the Boston BTPD. Proposals for roadway widening beyond presently agreed upon widths should not be accepted as mitigation measures for private projects, except on a case by case review. Such a technical process must be accomplished using traffic analysis methods which acknowledge the ability of the total system and its dominant bottleneck points to process the increase in traffic caused by a given intersection capacity increase. Such a method has been pioneered by CTPS and has been successfully applied in the determination of proposed Northern Avenue roadway widths.

Comments Concerning Pedestrian Transportation

The generally "forgotten mode" of transportation for which EOTC has responsibility is that of the pedestrian. Decisions are about to be made about the character and functioning of the pedestrian environment for this entire section of Boston. The State and the City recently agreed upon a simple rectilinear grid for local streets (page IV I-19) in the area. The basis for this street system is that new development should build directly upon

the old. Private-looking ring-roads were rejected in favor of a simple extension of the existing cross streets in the area. The location of new streets must be on a similarly spaced grid basis.

To this end, the Fan Pier Project is structured around very public entrance roads at Sleeper, Farnsworth and Pittsburg Streets. Access from the relocated Northern Avenue area for the pedestrian is clouded by the fact that all three cross streets (or paths) would have to rise to provide 16 foot clearance over the proposed Canals. The pedestrian flow and continuity implications of these large vertical ramp structures along Pittsburg and Farnsworth Streets should be carefully reviewed in the FEIR. Any change of vertical alignment at a critical juncture such as the entrance over the canals may actually cause a disruptive rupture in the already delicate fabric of the City's pedestrian environment. The net result may be just one more reason for development towards an auto-oriented environment not appropriate for or consistent with the rest of downtown Boston,
and not at all consistent with the mode split assumptions upon which the proposed density relies.

Comments Concerning Water Transportation

It is the policy of EOTC and City of Boston Transportation Department to encourage the use of water transportation even while we recognize its historically small role during peak hours.

On October 4, 1985 in a meeting of the State's Interagency Coordinating Committee (SICC) the proponents (Fan Pier and Pier 4 representatives) presented an outline of a "Feasibility Study - Potential Water Transportation Services." It was agreed that the outline (as reviewed and commented on by DEQE, EOTC and the City of Boston Traffic and Parking Department) provided an adequate framework for analysis of certain components of a water-based transportation system for the sites under review. The intention to conduct this study is mentioned several times in the DEIR.

At a joint meeting of the Harborpark Advisory Committee and the Fan Pier/Pier 4 Committee on January 9, 1986 at which the proponents presented a review of Chapter V of the DEIR entitled "Urban Design Issues," a statement was made by the proponent for Fan Pier that "since the Feasibility Study was not required as part of the initial scope, its results would not be included in the Final EIR." This is contrary to the original understanding of the State's Interagency Coordinating Committee and contradicts somewhat the DEIR position that (v.6-6) "If available, the results of the feasibility study will be reported in the Final EIR." The proponent did, however, state that the Feasibility Study would be completed in about two months and available for review and comment prior to issuance of the FEIR.

It is the position of the Executive Office of Transportation and Construction that while a Feasibility Study was not explicitly required in the EOEA combined scope and alternatives for the

EIR, such information is implied as required under Water Quality, Public Access, Visual Impacts, and Traffic Analysis. Therefore, the Feasibility Study results should be incorporated in the Final EIR, after review and comment by appropriate parties.

Given the absence of this information in the DEIR, the commitment of the proponents to serious water transportation services remains unclear and raises questions about the following:

1. Absence of designated landing to accommodate existing and potential commuter services.

2. Absence of data on any other prospective source of waterborne commuter traffic source besides the South Shore (i.e., Charlestown, East Boston, etc.)

3. Location of both the "water shuttle landing" and the "on demand taxi landing" inside the joint marina. (Neither the potential maneuverability problems or consideration for quick turn-around times required by these services is discussed.)

4. Airport water shuttle service needs to be integrated with other such services which may exist.

5. Suggestion that "an upgraded facility at Commonwealth Pier," rather than Fan Pier/Pier 4, is a likely location for a major terminal facility in South Boston. (All discussions in the SICC to date have encouraged evaluation of an on-site design at Fan Pier and/or Pier 4 for space that could be converted to a water transportation terminal should demand warrant it in the future.)

6. Absence of specific commitment to allow either daytime and/or overnight layover space for passenger vessels on the 300 feet of dock space adjacent to the Fort Point Channel.

7. Need for more information about how water transportation services will be conducted through the canal and through the Fort Point Channel.
8. Availability of fueling and sewage pump-out for commercial passenger vessels in the area of the marine facilities building.

9. Facilities for emergency vehicular access, handicap access to floats and gangways, an area where buses can be safely loaded and unloaded, a pedestrian/passenger holding area of sufficient size to handle crowds for special events, employee parking.

10. Consideration of intermodal connections between landside and waterborne transportation services, such as parking and drop-off/pick-up areas.

In short, the Boston metropolitan area is facing a major transportation capacity challenge within which development in this area must be considered.

As thoroughly documented elsewhere, without both the widened artery and tunnel, the region faces very severe problems, and further high density development on the site could not be accommodated. With a widened and depressed artery and seaport access tunnel, the needs of the region can be met and the development of this land can responsibly continue. The automobile generation capacity of this land is really set by the Northern Avenue interchange with the depressed artery and surface roadways. Development beyond this rather low density level requires significant transit investment to achieve the required utilization of transit. The pedestrian and water qualities of the site relate to the transit oriented character the site requires if it is to be compatible with the roadway capacity. The final EIR should reflect this approach to the analysis.

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RECEIVED
JAN 24 1986
OFFICE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS

M E M O R A N D U M

TO: Samuel Mygatt, Director, MEPA Office

FROM: Gary Clayton, Director
Division of Wetlands and Waterways Regulation

DATE: January 23, 1986

SUBJECT: Comments on EOEA #4426/4584

The Division is submitting the following comments concerning the Draft Environmental Impact Report for the Fan Pier Development and Pier 4 Development projects (EOEA #4426/4584):

Traffic and Parking - Section IV

In the DEIR, the proponents should provide more detailed information and figures where appropriate on parking and intermodal transportation facilities at the site in relation to the public's use of the site amenities and water transportation facilities. For example, this should include information on parking areas designated for excursion boat and cultural/commuter ferry operations, marina users and visitors to the waterfront park. Intermodal transfer facilities (e.g. taxi drop-off, bus service, etc.) provided for water transportation services should be discussed.

The proponents should provide more information on below-grade parking at the Fan Piers and Pier 4. For example, indicate its location, the number of levels below grade, the number of spaces, elevation of each level and programmed uses, if any. Since the developments are in areas subject to flooding, the proponents should discuss flood hazard impact on below-grade parking and appropriate mitigative measures.

Visual Quality - Section V.

It is recognized that visual impacts of the project will be enormous, both from the water onto land and from land out to

the harbor. The Department had difficulty determining building heights in the DEIR. These should be clearly documented to allow for appropriate review. The Department's primary concerns in this section center on the heights of waterfront buildings and visual connections to the water from inland locations.

Under the Lesser-Scale Alternative, the proponents have indicated that the height of the structures closest to the water have been reduced but building heights along Northern Avenue have increased. Although specific heights are apparently not provided in the DEIR, the analysis of the scaled buildings in this section leads the Department to ask for alternative designs that further reduce the height of waterfront buildings without any increase in building heights elsewhere on the site.

The buildings along Northern Avenue appear to create a walling-off effect of the land to water visual connection, leaving the orthagonal street corridors as the only potential means of gaining visual access to the water's edge. The proponents should review alternative designs which would maximize or enhance visual connections from the land to water and water to land along these view corridors. For example, the only clear visual connection to the waterfront along the Fan Pier appears to be from the orthagonal Pittsburg, Farnsworth and Sleeper Streets. These view corridors do not appear to create a visual link with the adjacent water's edge as exemplified in View E. The elevation of the bridge shown in View E appears to interrupt this view corridor.

Shadow - Section V.2

The shadow studies show a significant impact on sun-lit open space along the Fan Pier's water's edge. The expected effect of shadows during Spring Equinox (the condition that shows the average shadow to be expected during the majority of the year) at Fan Pier canal, open-space and park and some portions of the marina are dramatic. Most of the waterfront park and canal will be in shadow during the day. This seems to be largely a result of the building orientation and building height. The proponents should discuss design and mitigative measures which would improve natural lighting conditions in the public spaces, particularly during the winter season where the shadow footprints are greatest.

Wind - Section V.3

Studies of the ground wind environment at Fan Piers/Pier 4 Development reveals that ground wind velocities along the water's edge will increase on an average of 5 mph and 12 mph at the northern edge of the Fan Pier. This, coupled with increased winds redirected down the building faces toward the

ground level can create uncomfortable wind conditions for pedestrian traffic. Increased wind velocities, especially near boat docking areas, could create uncomfortable conditions for passengers waiting to transfer to and from land and vessel. The proponents should discuss mitigative measures or alternative designs which would minimize ground wind impacts on pedestrian traffic and vessel operation. The results of the Pier 4 wind erosion analysis should be presented and discussed in the final EIR.

Tidelands & Public Purpose - Section V.4

The "History of Filling" section presents a very brief legal analysis of the effect of two deeds which the proponent relies upon to claim title to the site. In light of the common law doctrine of public trust rights in tideland areas, as articulated by the courts in this state, as well as the federal courts, the Department disagrees with the proponents assertion that "neither the Commonwealth, nor any private party nor any member of the public has retained any rights in the 75 acres conveyed by these deeds which include all of the Fan Pier and Pier 4 Master Plan sites" and that "the application of Chapter 91 to the development sites is inappropriate." Nevertheless, the Department understands that the proponents intend to apply for and receive a Chapter 91 license prior to construction of the project and it is therefore unnecessary, and inappropriate, to require further legal analysis of the purported effect of those deeds in extinguishing the public's historic trust interest in these tideland areas.

Aside from this general comment, the Department has several specific suggestions concerning this section of the DEIR. The proponents should provide in this section a detailed evaluation of how these projects fulfill the provisions of the statutory tests of Ch. 91. Specifically, this evaluation should be organized and presented within the FEIR according to: 1) proper public purpose 2) public benefits versus public detriment to the rights of the public in tidelands and 3) consistency with the policies of the Massachusetts coastal zone management program.

Concerning the material presented in this section, figure V. 4-1 appears to be incomplete with respect to information documenting the placement of fill and/or structures at lots 1A and 11, the placement of a substantial amount of unauthorized fill at lots 4A, 6 and 9, and the placement of unauthorized walkways and waterfront structures at the Pier 4 site. The proponents should provide more detailed information as to when this unauthorized filling and placement of structures took place and the intended use of these structures and fill.

The proponents should provide detailed information and figures on the type of filled tidelands at both sites (i.e.,

private tidelands and commonwealth tidelands). The proponents should delineate their interpretation of the most landward position of the historic high water shoreline at or near the sites and document various historic maps or plans used to delineate this line.

Public Access - Section V.5

The proponents state that approximately 50 percent of each site is proposed to be dedicated to public open-space. The proponents should be required to break down this figure to include the respective areal extent and types of public access and open-space amenities for both sites to justify this assertion.

The proponents should evaluate alternative measures to reduce wind and shadow impacts on the large public areas proposed in the plan.

The proponents should provide design alternatives which would provide continuous public access around the entire seaward edge of site, including the Pier 4 restaurant facility.

Water - Related Activities - Section V.6

1. Commercial Water Transportation Facilities

The proponents should present and discuss design alternatives which would create more active waterside programming along the seaward edge of the Fan Pier. Using only 10% (200 feet) of the Fan Pier's 2000 linear feet of water's edge constitutes a substantial under-utilization of a precious commodity in this portion of Boston Harbor - docking space. Water depths of less than 20 feet at low water are certainly sufficient for additional docking of vessels, particularly commuter boats. This portion of the Fan Pier site could become more active on the waterside by providing transient and overnight layover and use as a staging/waiting area for commuter boats using water transportation facilities across Fort Point Channel at Rowes Wharf, 400 Atlantic Avenue, and Long Wharf. This could help alleviate some of the vessel congestion at those transportation facilities even if tie-up is on a periodic or on-demand basis. Simple cluster mooring-pile arrangements along the seaward edge of the Fan Pier could facilitate vessel docking and create an active water to land link which is non-existent in this area under the proposed design. Other alternatives should be investigated as well.

The proponents should present and discuss design alternatives which would provide commercial water transportation facilities (both landside and seaside) along the northerly edge of the Fan Pier at or near the proposed breakwater. The current proposal locates the water-shuttle and

water-taxi landings inside the marina basin. This could create vessel ingress/egress and manuverability problems within the basin due to a narrow inlet throat at the entrance to the basin and congested manuvering areas within the basin which would substantially add to the time of scheduled commuter ferry routes (both inner harbor and suburban). Experience has shown that commercial water transportation vessel operations ideally should be conducted away from recreational docking facilities due to operational constraints, noise and boat wake. An alternative location that seems to make sense would be along the northerly edge of the northern breakwater. This would provide unobstructed and less time-consuming navigational access for vessels, easier and more flexible vessel manuverability and, most importantly, separation of commercial and recreational vessel operations.

The results of the proponents' "Water Transportation Feasibility Study" expected by the proponents to be completed in about two months and made available for review and comment prior to issuance of the FEIR, should be incorporated into the FEIR document. The Department anticipates that provision of water transportation services by proponents will constitute an important element of the public interest required by c. 91. Incorporating this study into the FEIR for public review and comment would establish the proponents' commitment to water transportation services (e.g., water shuttle, water taxi) and would address such questions as: designated landing areas to accomodate existing South Shore/Boston commuter boat service en route to and from Rowes Wharf; data on any other prospective source of water-borne commuter traffic besides the South Shore (e.g., East Boston, Charlestown, South Station, North Station, Logan Airport, Long Wharf and Rowes Wharf); aspects of vessel operations such as docking, scheduling, and manuverability; any specific commitments to allow much-needed day time and/or overnight layover space for water transportation vessels; uncertainty about how water transportation services will be conducted through the proposed canal; and intermodal connections at the site as they relate to gaining access to waterborne transportation services. Finally, this study should also address vessel design, support and maintenance facilities, and passenger waiting and ticketing areas. Including the Water Transportation Feasibility Study in the FEIR would serve as the foundation for linking this important project site to downtown Boston and other areas of the city through the water transportation network.

2. Marina

Under the lesser-scale alternatives for the Fan Pier and Pier 4 there is proposed to be 60 slips at the Fan Pier side and 150 slips at the Pier 4 site totalling 210 slips. The proponents propose to allocate 10% or 21 slips out of the total for public transient boaters. This percentage appears to be

much too low. Public transient docking space for recreational boaters in Boston Harbor is a scarce resource. Providing this type of docking for the public tends to invite public use of waterfront developments as well as providing the much needed water to land linkage. The proponents should provide a greater number of public transient boat slips to encourage public use of the marina facilities at the sites. A figure of 20-25% of the total would seem to accomplish this.

The proponents should provide detailed information on proposed marina support facilities such as appropriate sanitary facilities, including showers and heads, electrical service, portable water service and vessel pump-out facilities. The extent of these facilities should be adequate to accomodate the anticipated number of boat slips.

Water Quality - Section VI.1

The proponents should provide more detailed information on water turbidity and siltation control related to dredging, filling and excavation activities during construction. More detailed information is needed to discuss containment of the temporary fill placed at the new canal entrance on the Fort Point Channel side to allow excavation and construction of the canal "in the dry". The proponents should document measures to be taken to properly contain this fill so as not to impede navigation or cause increased shoaling in the Fort Point entrance channel which is located directly adjacent to the fill-plug.

The proponents should provide the method of analysis and calculations used to arrive at their estimates of change in tidal prism and flushing time for the canal and marina basin. The proponents should provide an analysis of tidal current circulation within the canal and marina basin including a discussion of the effects of breakwater pilings on creating current eddies during tidal excursions and how this may effect navigation and sedimentation in the inlet throat.

Sewer Infrastructure - Section VI. 2-1

Much of the sanitary sewer system in the vicinity of the project area is currently being replaced through the combined activities of Boston Water and Sewer Commission (BWSC) and Massport, aided by a $2 million economic benefit grant from the Division of Water Pollution Control (DWPC) (VI. 2-3)

The total flow estimated to be generated by the combined developments in the design year of 1995 is 0.817 mgd-average day, and 1.501-peak day (VI. 2-15). The DEIR indicates that existing development north of Summer Street in combination with ultimate development of the Fan Pier and Pier 4 projects will not result in any significant surcharging of sewers during peak flow periods (minor surcharging may occur in the 18-inch sewer in Northern Avenue) (VI. 2-17).

If all future development north of Summer Street were to occur in conjunction with the ultimate development of these two projects, the existing 15-inch sewer in Northern Avenue west of Viaduct Street and the 18-inch sewer in Northern Avenue would experience some surcharging during peak flow periods (VI. 2-18).

DEQE concurs with the analysis of dry weather wastewater impacts contained in the DEIR, but suggests that an agreement be negotiated between the project proponents and the BWSC which would provide for the reconstruction, as necessary, of those portions of the sewer system upstream from the new Summer Street Pumping Station which may in the future (up to 1995) require corrective work. Also, the developer should be required to reimburse BWSC for biannual inspection and cleaning of these same sewers.

Combined Sewer Overflows - Section VI

The points of current CSO discharge in this area of Boston, Reserve Channel and Fort Point Channel (VI. 2-20) are two of the largest CSO discharges to Boston Harbor, with peak wet weather flows approaching 1 billion gallons per day.

DWPC currently classifies the waters adjacent to this development area as SC, lowest use classification, and even this low standard is periodically violated (approximately 20% of the time). Also, there are still major questions within DEQE, BWSC, and Massachusetts Water Resources Authority (MWRA) whether CSO discharges to the Inner Harbor (which include this planning area) need to be controlled and to what extent. These CSO issues will be addressed during the next year or so in compliance with a schedule of activities contained in the recently issued Federal Court Order.

The CSO projects for this section of the inner harbor are also very low on DWPC's implementation program due to the low cost-benefit ratio, extremely high capital cost, and the interactive impacts of other construction projects such as the third harbor tunnel and central artery. A consultant will eventually be retained by the MWRA to reanalyze all CSO issues relating to the Inner Harbor (mid 1986).

The DEIR states that there are no combined sewers or CSO discharge points in the project area and that the combined system components begin in the downstream portions of the North Branch of the Boston Main Interceptor (VI. 2-7). The DEIR also states that this system will only overflow during wet weather conditions when the system flows exceed 3.5 times the Average Dry Weather Flow, assuming the removal of sediments from the North Branch Interceptor, planned for 1986 by BWSC (VI. 2-20).

The report also states that the volume and/or increase in rate of overflow at these CSO points, due to these developments, has not yet been determined and that additional

physical inspections of the overflow structures and regulators will need to be conducted prior to completion of the FEIR in order to allow for analysis of the overflow impacts. This study must be carefully coordinated with BWSC studies also being performed in this area (VI. 2-20).

The FEIR should discuss in greater detail the implementation plan for removal of sediment from the BWSC North Branch Interceptor. Since the removal of these sediments will have a significant impact upon the number and period of combined sewer overflows from this planning area, the completion of this work should be required as a water quality mitigation measure.

In the future, the CSO aspects for this the larger Fort Point and Reserve Channels planning area will be determined and structural solutions developed and implemented. Since this development project will be a major contributor of total wastewater flows to this combined sewer area, it would seem appropriate that the proponents provide a mechanism to reduce the financial impacts of such a CSO solution. The Secretary should require further information concerning the option of requiring the proponents to establish an escrow account to be utilized by BWSC for those CSO corrective measures within this drainage area eventually deemed necessary by DWPC.

Storm Drainage - Section VI

The DEIR states (VI. 2-20) that gas/oil separators will be installed and maintained and that EPA's new storm water regulations, expected to be issued in 1986, will be addressed in the FEIR.

Since storm drainage has been shown to be a significant contributor to the degradation of the water quality in Boston Harbor, proponents should be required to discuss in the FEIR the development of a state-of-the-art storm drainage collection and control plan specifically addressing preventive maintenance of catch basins, scheduled cleaning of oil/gas separators, street sweeping, and installation of trash racks on drain outfalls, etc.

Flood Hazard Impacts

The proponents should provide a detailed discussion of potential flood hazard impacts to the site developments for the 10, 25, 50 and 100 year storm events. This discussion should include an analysis of expected wave forces, structural stability, flood control and erosion/run-off control during storm events. Mitigative measures for flood hazard impacts should also be presented.

cc: S. Russell Sylva
C. Dierker
S. Lipman
C. Natale

The Commonwealth of Massachusetts
Metropolitan District Commission
20 Somerset Street, Boston 02108

RECEIVED
JAN 24 1986
OFFICE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS

Mr. James S. Hoyte, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street,
Boston, Ma. 02108

23 January 1986

Dear Secretary Hoyte:

Attn: MEPA Unit
Re: EOEA File #4426/4584
Fan Pier/ Pier Four Projects

Thank you for the opportunity to review the Draft EIR for the above-referenced project.

The Metropolitan District Commission is concerned about the level of traffic impact that is envisioned with these developments and the inadequacy of the proposed mitigation. Approximately 44% of the traffic bound for the site originates to the south and southwest of the metropolitan region. A significant portion of this traffic is anticipated to use Morrissey Boulevard, Day Boulevard and Old Colony Avenue to reach the project area. These roadways are part of the MDC Parkway system and serve recreational and local access needs as well as regional traffic. Traffic on these roadways is adversely impacted by the proposed development.

Page 7 of the January 31, 1983 Scope requested that the proponent "...propose a traffic control plan which would reduce the incentive to detour through South Boston." The traffic analysis and mitigation presented falls short of such a plan. For example, the suggested improvements at Day Boulevard and L Street would appear to encourage rather than discourage thru-neighborhood travel. MDC policy is to discourage thru commuter traffic on Day Boulevard. The Final EIR should discuss the requested traffic control plan in detail.

The only mitigation measure that is a new way of relieving overcrowded roadway and transit systems is the proposed South Shore commuter boat; yet this proposal is ill-defined in terms of the proposed development and does not define any level of participation on the part of the proponent. The Final EIR should be explicit in terms of developer contribution to such mitigation measures. While we support and encourage further water taxi efforts in the Harbor, commuter service is a particular priority.

Obviously there are other approaches to diminshing traffic impacts including a review of land use mixes and the overall density of the project. While these are outside MDC purview we would encourage their consideration.

For future clarity please note that Columbia Circle is more properly known as Kosciuszko Circle.

In summary, this very large development proposal has severe traffic impacts. Some of these impacts affect residential neighborhoods and recreational areas of regional importance. Day Boulevard in particular experiences significant summer time congestion in addition to the commuter overloads on Morrissey Boulevard and Kosciuszko Circle. The Final EIR must be more specific in terms of traffic by-pass plans and developers' contributions to mitigation measures.

Sincerely yours,

William J. Geary, Commissioner

the boston harbor associates
"for balanced harbor development"

On Board The Chelsea
300 Congress St., Boston, MA 02210
Telephone (617) 426-5025

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January 23, 1986

Mr. James Hoyte, Secretary
Executive Office of Environment Affairs
100 Cambridge Street, 20th floor
Boston, MA 02108

Attn: MEPA Unit
Re: EOEA # 4426/4584 Fan Pier/Pier 4 Developments

Dear Mr. Secretary:

I am writing to report to you the comments of the Boston Harbor Associates regarding the DEIR for the the Fan Pier/Pier 4 Project, (FP4),.

At the outset we wish to record our concurrence with and support for the comments of the Fan Pier Advisory Committee and the Harborpark Advisory Committee on this project and EIR. TBHA is a member of both of these committees and has fully coordinated its review of this project with those groups. I will not fully repeat or summarize those comments asking that you accept those documents as appendices of this letter.

We do wish to place emphasis on several aspects of the DEIR and the proposed project.

Public Access

A major portion of the public benefit under Chapter 91 licensing for this project will be the public access to this project. TBHA has a great deal of experience and expertise in the area of identifying good and poor access.

Based on our background and through reviews of these proposals we believe that an alternative must be composed which will produce dramatically expanded and improved access - both pedestrian and boat. Our goal is to seek to guarantee that regardless of the private uses of this property it welcomes and becomes a magnet for all citizens of the city.

The features of an alternate plan for public access would be:

1. A clear design for high quality access, possibly a harborside promenade from New Northern Avenue Bridge to the proposed waterfront park.

2. Creation of a larger public assembly area on the main ship channel face of Pier 3, unshadowed with clear programming options and utility support for this space. The provision of public restrooms is vital at this location.

3. Withdrawal inland and reduction in height of the proposed Pier 3 hotel tower and reuse of the hotel site in more public uses design to join with the assembly space in a mutually reinforcing manner.

4. Active use of all bulkheads for docking of a variety of vessels. Minimization of passive bulkheads especially in front of passive open space.

5. Some alternatives to the proposed canal: The shadowing of abutting buildings acting in conjunction with the climatological circumstances of Boston will severely hamper the useability of the canal as quality public access space. In addition, the bridges will interrupt the sight live from Northern Avenue to the harbor.

On the other hand the elevation of the bridges which produce mean high tide clearances of 16' will severely restrict its useability as a navigable tributary of Boston Harbor.

Therefor the canal is an expensive and heavily compromised facility from the point of view of Boston Harbor.

Since bridge clearance cannot be increased without further disrupting the site, we would offer the suggestion that an alternative which would show a promenade with appropriate landscaping might reveal that many of the visual and pedestrian opportunities would remain while several of the negative impacts of the canal would be lost.

Sewage

TBHA requests that an alternative be developed which results in no projected generated wet or dry weather discharges of untreated sewage to Boston Harbor.

Traffic

We join and fully support the Traffic section of the HPAC and FPAC recommendations.

We, however, do wish to draw special attention to the possible interpretation of Chapter 91 Traffic generation from the project, to the degree it impairs access to the seaport, could be defined as a public detriment as it results in traffic generated by non-water dependent reuse of tidelands impairing traffic generated by a water-dependent use of tidelands.

Urban Design

We join and fully support the HPAC section in this regard with special emphasis placed on an alternative of 25-30% lower total square feet and relocation and reduction of the Pier 3 hotel tower to confrom to the Harborpark guidelines.

We are, as always, available to assist you in whatever manner will advance the day when Boston Harbor is fully clean, **accessible**, and **alive**.

Respectfully,

Thomas Ennen

The Commonwealth of Massachusetts
Executive Office of Transportation and Construction
Department of Public Works
Ten Park Plaza, Boston 02116-3973

January 23, 1986

The Secretary
Executive Office of Environmental Affairs
Leverett Saltonstall Building
100 Cambridge Street
Boston, MA 02202
Attn: MEPA Unite
Dear Mr. Hoyte,

RECEIVED
JAN 24 1986
OFFICE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS

RE: EOEA #4426/4584 Draft Environmental Impact Report
Fan Pier Development/Pier 4 Development

The Initial Master Plans for the project sites include a number of constructive uses of the waterfront for transportation, which demonstrate the developers' interest in and commitment to investment in the connections between the land and harbor. The proposals for working canal with landing areas, and a series of levels of water transportation connections demonstrate an innovative approach to a unique site, and a commitment to resolving traffic problems within the framework of the development.

The Lesser Scale Alternative is a disappointing retreat from this original proposal. From the Initial Master Plan discussion of a usable canal which would provide circulation throughout the project with landing areas, to a canal which will be constrained by bridge heights to be usable only at high tide reduces a valuable and protected waterway system to little more than an ornamental moat. Also, the Lesser Alternative, rather than developing mitigating water transportation opportunities of a commuting nature, focusses rather on destination services which will attract additional traffic to the site: a restaurant excursion boat, a coastal cruise vessel, a culture loop boat and an expanded marina.

From an Initial Master Plan which envisioned canal traffic similar to Venice and Hamburg, and which linked the site to the mainland by two bridges, thereby enabling vessels to use the Fort Point edge as a harbor of refuge in storms, (another highly desirable water feature), to a plan which limits the canal by the addition of two additional pedestrian walkways to add to the "viewing platform" possibilities of the site shuts out the water-dependent activity in this important waterway.

Additionally, where the scope requires that "waiting areas and other public facilities for public transportation"

be treated, there is no consideration of landing areas, shelter, necessary utilities, intermodal connections, handicapped access, or coping with wind and ice conditions on the site. Although a ferry service, to be successful, must have taxi, van or bus links or be within protected walking distance of the destination, all one sees in the EIR are vacant undefined spaces which do not address any of the transfer issues.

In terms of traffic analyses, although the scope requires in the Background Development Assumptions that all new development in the South Station area, and near-term development be considered, there is an absence of mention of the traffic impacts of International Place, the proposed addition to the World Trade Center, and Rowes Wharf. The focus of these developments will be Northern Avenue at Atlantic Avenue. Does the 5% growth projection realistically respond to the figures being generated by these developments which are not specifically mentioned in the scope?

Returning to the project's capability to handle traffic, if 24,000 daily trips are anticipated in the eventual full-build project, and there is an estimated parking deficit of 2100 spaces, it would seem to make sense that a commuter boat terminal should be required, and that it should be designed to handle that deficit in the long run, which is about 10% of the estimated daily trips. Has a water transportation feasibility statement been undertaken?

Rather than being merely a "pleasant" form of transportation, water transportation is a critical link in many urban transportation systems and developments elsewhere (NYC -- 75,000 daily; Seattle -- 40,000 daily; Hong Kong -- 30 million a month by water) and should be viewed as such, particularly during the next dozen years before the Third Harbor and Central Artery project is finished.

In the discussion of the marine service facility on the Fort Point Channel side of the project, it is unclear how this will be managed or designed.

Is the facility being designated for a single provider? Originally, there was some indication that the facility would be open to general commuter and cruise boat operators for service needs. It would be beneficial to develop an Operations Board similar to Rowes Wharf to manage the development of the marine service facility, as well as the marine transit edges of the Fan Pier project.

Certainly, in the old prints showing the Fan Pier in its most active commercial years, the edge was lined with ships headed for destinations all over the world. The edges displayed in perspective renderings in the Draft EIR show an absence of

boats of any kind along the fan edge, and in the lagoon, other than private yachts. This absence indicates real lack of understanding of and commitment to harbor transportation and the life of the Port of Boston. What could be the most exciting and lively wateredge development in the world, in its lesser alternative becomes rather ordinary.

Sincerely,

Martha Reardon

Martha Reardon
Associate Commissioner

MR/rs

Metropolitan Area Planning Council

110 Tremont Street Boston, Massachusetts 02108 (617)-451-2770

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JAN 2[illegible] 1986

OFFICE OF THE SECRETARY OF
[illegible] ENTAL AFFAIRS

January 23, 1986

The Honorable James S. Hoyte, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA. 02202

Attention: MEPA Unit

Re: Fan Pier/Pier 4 Development Draft EIR, Boston, EOEA # 4426/4584
(MAPC DEIR 86-19, received 12/24/85)

Dear Secretary Hoyte:

In accordance with the provisions of Chapter 30, Section 62 of the Massachusetts General Laws, the Council has reviewed the above Draft Environmental Impact Report (DEIR).

This DEIR concerns two separate projects which, because of their proximity, are being analyzed together. Between the two of them, they would entail approximately five million square feet of total development. Retail, office, residential and hotel uses would be included.

The size of the combined projects, their siting on the waterfront, their location in a relatively undeveloped area and their potential to stimulate the redevelopment of the industrial portion of South Boston, make them significant additions to the city. Particularly as regards their impact on the transportation facilities of the downtown area, the projects require special scrutiny to insure that their scale and design are such as to facilitate their smooth integration into the existing environment.

MAPC has prepared the comments below in response to the DEIR's treatment of issues of transportation; urban design elements; tidelands public purpose; sewer and storm drainage; and mitigation of construction effects.

Transportation

Trip Generation:

The DEIR's assessment of the projects' trip generation potential is based on assumptions about the trip-making behavior of users of the proposed development. These assumptions are drawn from a variety of sources, such as the EIR for International Place, and are given in Table IV.1-14. Without implying that these trip-generation rates are invalid, it should be pointed out that in every case they are lower than those given by the Institute of Transportation Engineers (ITE) in its manual on the subject. In the cases of office and hotel uses, the rates given in the DEIR are half ITE's average rates, and considerably less than what ITE lists as a 'minimum' or low end of the range.

William C. Sawyer, President Frank E. Baxter, Vice-President Marjorie A. Davis, Secretary Franklin G. Ching, Treasurer

Executive Director: Alexander V. Zaleski

Granted, the DEIR's analysis is in terms of vehicle-trip generation rather than person-trips, which is the ITE manual's concern. But the discussion in the appendix of the methodology used in converting the latter to the former is cursory, incomplete, and in some cases unsupported, as when the mode split between transit and auto is given as 30%/70% for office workers and, without explanation, reversed to 70%/30% for hotel and retail workers. The derivation of each of the rates in Table IV.1-14 should be shown in the appendix step by step, so that it is not necessary to guess how mode-split assumptions are made and how they affect vehicle-trip-generation rates. Failure to justify rigorously the use of such low trip generation rates will lead to the unavoidable conclusion that traffic impacts will be greater than this DEIR predicts. Reference should not be made to previous EIRs without justifying the assumptions they made.

Parking-Constrained Demand

At the core of the DEIR's discussion of traffic impacts is the argument that the supply of parking will be the limiting factor which determines how many automobiles are driven to the project site. The 2,100-space deficit is predicted to force would-be drivers into using public transit or car pooling, since the city's EPA-imposed parking freeze prevents more parking from being provided.

This reliance on the parking freeze to limit automobile traffic volumes, irrespective of the number of people which new development brings downtown, is becoming commonplace in EIRs. Apparently developers consider Boston's vitality and the quality of their own projects sufficient to attract patrons, clients and tenants in spite of the penalty which the impossibility of finding a parking space imposes. The parking freeze has had the documented effect of suppressing traffic volumes. But if the demand for parking is allowed to grow far beyond what the supply can satisfy, the effectiveness of the freeze may be undermined as competition for spaces increasingly results in cruising and illegal parking. The assumption that, because of the parking freeze, the amount of person-traffic is unrelated to the amount of vehicle traffic, is questionable.

Furthermore, there is no guarantee that the parking freeze will remain in effect. The Boston Traffic and Parking Department (BTPD) and the BRA have stated their desire to create new parking supply at North and South Stations (although the EIR claims ignorance of "any known public proposal" to that effect). In fact, when large projects such as this one, International Place and Rowes/Foster's Wharf put extreme pressure on existing parking, the users of those very developments may be among the most interested in increasing the supply.

The FEIR should show what the traffic impacts of the projects would be if the parking freeze were relaxed. The analysis should consider a scenario in which, as BTPD has recommended, a 3,000-space garage is built at South Station, and a 1,500-space facility at North Station. The results of such an analysis would be helpful both in estimating the potential impacts of the projects and in clarifying the role of the freeze in managing downtown traffic volumes.

The City of Boston has not officially declared that the parking freeze is a program which it approves of and will support indefinitely. In light of the great amount of development which the City has approved in the downtown, which would generate more traffic than the streets could handle if the parking supply were not constrained, the City should clarify its policy on the freeze. It is important that developments not be approved on the assumption that the parking freeze will continue to control the level of traffic on downtown streets, if that is not the case.

Trip Distribution

An important aspect of the projects' impact on the local environment is their contribution to traffic volumes on the proposed Seaport Access Road. The EIR for the Third Harbor Tunnel/Central Artery project states that the Seaport Access Road will, under the best of conditions, be congested and slow at peak hours. The contribution of the Fan Pier/Pier 4 developments to this congestion is relevant to review of these projects, yet Figures IV. 1-17a, 18a, 19a and 20a fail to show the projected volumes, in the "build" and "no-build" circumstances, on the Seaport Access Road. This failure should be remedied in the FEIR.

Impacts on Transit

Given the proponents' assertion that parking constraints will force between 25 and 35 percent of travelers to these developments to use transit, the analysis of public transportation impacts is crucial. The DEIR concludes that, with or without the projects, in 1995 the Blue Line will be over capacity and the Red Line well under. However, the DEIR's treatment of the projects' impact on transit ridership, while extensive, is vague in some of its details.

Table IV.1-39, Projected Peak Hour Transit Volumes and Capacities, is central to the discussion. Its apparent use of turnstile counts as a measure of directional ridership is not valid. Furthermore, a comparison of Table IV.1-8 with Table IV.1-39 seems to indicate that the total two-directional ridership through South Station is used in the latter table as a southbound volume, and that the total two-directional capacity is used as a northbound capacity. Table IV.1-39 should be redone to clarify its meaning and derivation.

Table IV.1-36 indicates that 55 percent of those boarding the Red Line northbound at South Station would transfer at the Park Street station to the Green Line westbound. Since the Green Line is already the most congested line, the impacts of new ridership there is more likely to have a deleterious effect than on the other lines. The impact of the projects on the Green Line westbound from Park Street should be analyzed.

Mitigating Measures

With regard to mitigating measures, the proponents' recognition of the potential for water transportation is commendable. The DEIR contains no definite commitments, however. The water shuttle and taxi options which the DEIR says the proponents are considering are important components of the solution to the transportation problems the projects will raise. The FEIR should outline in detail the water transportation measures which the proponents are willing to undertake.

The same should be done regarding shuttle bus service. The degree to which users of the Fan Pier/Pier 4 developments will ride the MBTA will be directly tied to the accessibility of the projects to the exisiting subway system. The proponents must assure that they will maintain one or more dependable, high-frequency lines to the MBTA.

A particularly promising opportunity for water transportation would be a shuttle between the project site and the Aquarium subway stop. The possibility of the proponents subsidizing such a service, as well, perhaps, as improvements at the subway station itself (which could be performed in conjunction with the Central Artery Depression), should be discussed.

These projects represent a very large increase in the size of downtown Boston. It is essential to have a reasonable estimate of their probable impacts on traffic conditions, under realistic assumptions about trip generation and possible city program and policy developments. If volumes on local streets turn out to be higher than projected, the number of intersections which will become dysfunctional may go up sharply. The FEIR should justify its assumptions independently, and not simply by reference to previous EIRs.

Urban Design Elements

Based upon information submitted in the DEIR, the "Initial Proposal" and "Lesser-Scale Alternative" appear to conform to development guidelines established by the BRA. Regardless of which design alternative is ultimately pursued, the development represents a drastic intensification of the use of the property and a major change in scale from the immediately surrounding environs. Perhaps it is inevitable that Boston's skyline will ultimately contain many more tall buildings, even with the "Boston Plan." For now, however, the Fan Pier development stands as an island of intensity in a small section of the peninsula that has had relatively few such intrusions. This very significant change should occur only after there have been ample opportunities for discussion and negotiation involving the city, the affected neighborhoods and impacted interest groups. These discussions should include such issues as: the ultimate size of project; shape, dimensions and urban form; architectural details; and similar considerations.

The site plans have taken into consideration important views from within the site and have oriented such design features as the canal to highlight external features such as the custom house tower. The proposed construction will cast shadows and increase wind velocity that may preclude the use of the open space for extended sitting, but it appears well-suited to a number of activities such as strolling and shopping.

Tidelands and Public Purpose

This section describes the history of the ownership, use and filling of the tidelands. It does not contain any recommendations concerning future activities on the site.

Public Access

The Initial Proposal for both sites represents an improvement over existing conditions for public access and open space. The Lesser Scale Alternatives provide for 10% more open space and better access to it. The Lesser Scale Alternative for the Pier 4 Site allows for more appropriate use of the water's edge. The Lesser Scale Alternatives' design for the eastern edge of Pier 4 (Figure V.5-2) which has additional marina space along the edge facing Commonwealth Pier rather than a shopping arcade, is a much more appropriate, maritime-related use of space along the water. In addition, the two pedestrian bridges over the canal provide better access for pedestrians and help to reinforce the pedestrian usage of the site which is central to the Harborwalk concept.

Water-Related Activities

The Lesser-Scale Alternatives substantially increase the number of water-related activities on the site. These are activities which are appropriate uses and which will draw people to use the open spaces and other facilities. The Lesser Scale Alternatives also recognize the importance of water and transportation.

Water Quality (Related to Shoreline and Bottom Work)

Neither the Initial Proposal nor the Lesser Scale Alternatives involve fill for the purpose of creating new land area. In both proposals, filling is limited to temporary construction-related fill and fill required to stabilize the seawalls. This fill is directly related to reintroducing water-related uses and is integral to the project. The mitigation measures proposed should be followed carefully and incorporated into the necessary permits.

Similarly, all dredging activity is related to providing for water-related uses and should not pose a problem if mitigation measures are followed.

Sewer

According to the projected peak-sewage flows in the Draft EIR, surcharging will occur in the 18-inch sewer at Northern Avenue and Trilling Way when the projects' peak flows are combined with the peak flows of existing development in the area. More significantly, when combined with the projected peak flows of all future development north of Summer Street, surcharging will occur in the 18-inch sewer, as well as in the 15-inch sewer along Northern Avenue. According to the figures in the Draft EIR (Table VI.2-5), the 15-inch sewer would receive a peak flow which is 31 percent greater than its rated capacity. However, the EIR does not indicate how frequently such surcharging would occur, what its likely effect on the collection system would be, or what corrective or mitigative measures could be undertaken to avoid adverse impacts. All of these issues should be addressed and resolved in the final EIR.

Storm Drainage

Storm-water facilities become particularly important on a Boston Harbor waterfront site. Water quality issues include: grease isolation; controls on winter salt; roof and HVAC runoff; impermeable surface drainage, and perhaps even a degree of organic nutrient runoff from landscaped areas. At this point, detailed design plans of the storm-water system do not appear to exist, and information is extremely limited. Such plans, along with final mitigations, should be made available concurrently as both the engineering design and environmental review processes move forward.

Construction Mitigation

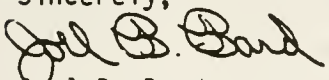
The use of slurry walls, pre-cast materials and other techniques is commendable, but at some further point in the process, the City of Boston will have to decide what construction methods must be compelled by means of the development permit process. The use of on-site dredged materials should be approached with great caution, however, due to the potential of toxins being present. The responsibility of the developers for oil spills in relation to the removal of the Peter Stuyvesant Hull also must be confirmed.

Traffic management and safety, timing of truck deliveries and access maintenance are all of crucial importance in construction mitigation. Detailed plans must be established.

Finally, there must be careful control of construction runoff and siltation. Stored soil, fill and gravel, as well as excavated material and bottom spoils, must be properly secured. Suppression of escaped dust also must receive major attention and be monitored by the City; construction dust can be a major problem in downtown Boston.

Thank you for the opportunity to comment on this DEIR. We look forward to reviewing the FEIR, and hope that these projects can proceed to the advantage of the city and the region.

Sincerely,



Joel B. Bard
General Counsel/
Assistant Director

JBB/AM/amf
cc: Richard Dimino, Boston
Alfred Howard, BRA
Andrew McClurg, MAPC
Glenn Garber, MAPC
HBC Inc.
The Boston Mariner
Martha Reardon, MDPW
(A-59)

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RECEIVED
JAN 23 1986
OFFICE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS

January 23, 1986

Mr. Samuel Mygatt,
Director, MEPA Unit
Massachusetts Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02108

Dear Mr. Mygatt,

The Massachusetts Port Authority has reviewed the Draft Environmental Impact Report for the Fan Piers/Pier 4 project, EOEA #4426/4584. Our comments on this document are divided into several categories as follows: Development Assumptions, Traffic, Parking, Public Transportation, Urban Design, Environmental, Mitigation Measures, and Summary. A number of suggestions for further analysis are summarized at the end of the letter.

First, we wish to commend the proponents and their consultants for the extent and thoroughness of their work. They have collected and analyzed data that go well beyond the strict requirements of the Fan Piers/Pier 4 projects, to the benefit of the public at large. We hope that the inclusion of projects beyond the proponents' control does not confuse the assessment of impacts of their project with that of others not yet started.

As you know, the Port Authority's enabling act directs it to encourage and support economic development of the region. The Authority wants to encourage economic development of South Boston whether increases in economic activity occur on its properties or those of others. Massport believes that the Fan Piers/Pier 4 projects will make significant contributions to the region's economic activity and that they deserve encouragement.

Massport is also interested in maintaining the viability and assuring the future of existing industrial and commercial investment in South Boston. As developer/operator of commercial seaport terminals and Fish Pier facilities in South Boston, Massport has invested over $200 million in water-dependent facilities serviced exclusively by trucks. We are concerned that the pace of development not outstrip the ability of the public infrastructure to support both existing and new traffic, parking, and other activities which accompany desirable increases in jobs, taxes, and income.

It is the policy of the Board of the Authority to minimize the adverse impacts of its activities on the neighborhoods in which Massport facilities are located. Access between these facilities and the regional expressway system relies entirely on South Boston roadways. Truck access is already extremely difficult and the Authority is veryconcerned that truck access not deteriorate further. Indeed, Massport looks forward to the day when trucking movements and connections to the regional expressway system are enhanced by the completion of the combined Central Artery and Seaport Access/Third Harbor Tunnel project.

Development Assumptions: Compared to conditions on site today, the Floor Area Ratio (FAR) of the proposed project is 4-4.5; the effective density of development once public open spaces and streets are subtracted is closer to 9-10 -- nearer typical downtown FARs. With the effective development densities of the proposed Fan Piers/Pier 4 project and Downtown being very similar, a careful assessment of the capacity of existing infrastructure, particularly with long lead time categories such as transportation, becomes extremely important to ensuring the continued economic vitality of South Boston.

The Lesser-Scale Alternative presents commendable enhancements of public amenities. However, we note that the January 31, 1983 MEPA scope asks for examination of alternatives with significantly lower density. We feel that the magnitude of anticipated traffic impacts is such that a reduction of approximately 139,000 sq.ft. in housing and retail commercial uses does not address this requirement since it does not significantly change Level of Service (LOS) impacts at key intersections.

We believe that the Final EIR should address the implications of a lower density alternative or land use mixes with different traffic peaking characteristics or some combination of these sufficient to noticeably change LOS at critical intersections.

Traffic: Massport comments about the traffic analysis reflect concern with the impact of proposed development on trucking access for existing industrial and service activities such as the Fish Pier, Conley Terminal, Massport Marine Terminal, Boston Marine Industrial Park, fuel oil terminals, and many warehousing/distribution/light manufacturing activities. These facilities rely on trucks and will continue to do so as they expand in the future.

The traffic analysis in the DEIR focuses chiefly on commuting patterns. However, trucks and delivery vehicles have different peaks, different key intersections, and different sensitive streets. Massport has previously expressed its concern that two major intersections which affect the flow of trucks to the regional expressways have not been specifically studied. Traffic conditions at L and First Streets and in front of the EDIC gate are important because congestion at these points encourages trucks to detour through residential streets to get to bridges which provide connections to regional highways.

Truck traffic in South Boston is roughly twice what it is in most other Boston neighborhoods; in addition, service deliveries represent 6-8% of total traffic from the projects. We feel these numbers warrant a comprehensive disaggregated study of commercial vehicles, including both trucks and delivery vehicles, in 1990 and 1995. Where will these vehicles go? How do their peaking characteristics correspond to commutter peak hours?

Massport is particularly concerned about LOS impacts for the movement of commercial vehicles at the critical intersections which connect South Boston with the regional expressway system, e.g. Northern Avenue, Dewey Square, Congress Street, Broadway, and Andrews Square as well as the two internal intersections mentioned above.

While it is necessary to make assumptions about future traffic generation and traffic conditions, Massport has reservations about some of the assumptions used in the analyses. Some of our major concerns are as follows:

1) Mode Splits: The assumption that site "proximity to downtown" translates into equivalent mode split for South Boston (p.IV-1-85) is open to question. We have difficulty in agreeing with a direct comparison of downtown and South Boston conditions for the projects without mitigation measures because it assumes inelasticity of choices. People who do not park at their place of work Downtown can a) park further away, b) take a bus, or c) take transit; that is, there are immediate alternatives which do not involve more than 10 minute travel differences. In South Boston, the current choice is to drive or walk 20-30 minutes to connect with a public transportation mode. We believe this will affect mode split choices, especially after dark or in inclement weather.

Choices between public and private transportation are likewise affected by considerations of multiple fares and transfers and total trip times. In addition, the 1980 Journey-to-Work data was collected right after an energy crisis and little or no empirical data is offered to support assumptions about upward trends in vehicle occupancy rates or modal splits.A sensitivity analysis in the Final EIR would be helpful in establishing the effects of shifts in modal splits on anticipated traffic impacts.

3) Trip generation rates: As we understand the DEIR, trip generation rates for hotels, luxury housing, and office buildings used in the analysis of the Fan Piers/Pier 4 projects are modifications of estimates for existing downtown developments. These rates are reduced by approximately 19% for 1990 and 25% for 1995 to match the supply of parking at the Fan Piers/Pier 4 facilities. Even Downtown , parking supply is not the only determinant of choice of travel modes. We believe the Final EIR should analyze and explain assumptions about trip generation rates in more detail.

While the number is probably small, the number and timing of trips generated by recreational boating activities is of interest.

4) Parking demand: Unfortunately, demand for auto access is not totally constrained by legal parking availability as is assumed in the DEIR. As there is no assurance that enough public transportation will be available, we are concerned that more people may drive to South Boston than the number of parking spaces suggests. Our concern is that the absence of sufficient parking spaces in the area will generate drop-off traffic or illegal parking, thereby diminishing street and intersection LOS in a way that the DEIR analyses do fully address.

5) Infrastructure: The traffic analysis assumes that both the Central Artery and Seaport Access Road/Third Harbor Tunnel will be available in 1995. It also assumes that the new Northern, Congress, and Summer Street bridges will be fully improved in 1995. To the best of our understanding, availability of the widened, depressed Central Artery will trail completion of the Third Harbor Tunnel by some years. Massport is therefore interested in knowing what LOS may be expected at key intersections under 1990 and 1995 build-out assumptions when current construction schedules are taken into account.

As far as we can tell, the LOS analysis at intersections does not reflect the proposed heavy use of bus access to the site; it should do so especially for AM and PM peak hours.

7) Indirect Impacts: Parking demand impacts on MBTA remote parking sites such as Alewife, Quincy-Adams, Braintree, and Orange line lots should be addressed. As the DEIR documents a substantial parking gap on the order of 7,000 spaces, some thought should be given as to how growth in background demand for MBTA parking given may affect trip choices to South Boston.

Public Transportation: Walking from the Fan Piers/Pier 4 projects to South Station or the Aquarium MBTA station will be delightful in good weather for those able to walk but less than attractive at other times. Since distance, weather, travel time, and number of mode splits affect mode choices, the assumptions used to assess the potential for public transportation become very important.

It is clear that improvements in public transportation will be necessary to make traffic conditions acceptable, but the most significant of these improvements require action by others than the proponents.

Given the level of peak demand for transit access to site (4,600 trips/peak PM hour, exclusive of background trips in 1995), bus service may be operationally difficult. Streets might be too congested with buses to meet that level of peak demand; 4,600 peak hour trips require 30-40 buses operating at less than 30 second headways. This has significant implications for bus stop/station design, size, and for street/intersection level of service.

As far as we can tell, the bus service and headway analysis does not take into account LOS at intersections; we believe it is important to know what happens if this is taken into account. Is there a demand for added charter bus access to sites? Has impact on traffic LOS been taken into account? Will there be express bus access to the sites? If so, how will they be accommodated? These issues should be explored in the Final EIR.

In summary, Massport is interested in a fuller analysis of the traffic impacts of the Fan Piers/Pier 4 developments to understand their effects on the ability of the roadway and public transportation infrastructure to provide reasonable LOS for truck access to regional expressways.

Environmental: From the DEIR, we cannot determine the size of the construction period fill used to reinforce the bulkheads during digging of the new canal. If the fill is large, it may affect tidal flushing of the Fort Point Channel; we believe the impact should be investigated. Changes in utility capacity are also of concern.

Urban Design: Massport's chief concern in this area is that views of downtown, the Customs House Tower, and the waterfront from South Boston are significantly altered by the proposed massing.

Elimination of views of the downtown skyline, including the Customs House Tower, from the west side of Commonwealth Pier significantly reduces its attractiveness as a site for offices.

The proposed massing likewise affects views of these landmarks from the proposed development on Parcels A & B/World Trade Center building. Massport would like to know how high this last facility would have to be to regain the amenity of a view of downtown and the horizon; reduction in view amenity obviously affects the economic viability of the project.

Mitigation Measures: It is of some concern to Massport that the major traffic mitigation measures proposed to reduce traffic impacts depend to a very great extent on cooperative actions by others than the project proponents. Roadway and bridge improvements, bus service, parking supply increases, and traffic regulation changes and enforcement, and flex time are all activities outside the control of the Fan Pier/Pier 4 developers.

As reduction of impacts depends on such measures, Massport feels that construction of the project should be coordinated with the implementation of mitigation measures. In this respect it would be extremely helpful if the Final EIR defined, costed, prioritized, or quantified proposed mitigation measures and estimated their probable effectiveness on street/intersection LOS. For example, the FEIR might identify and quantify mitigation measures:

- Which are implementable/fundable by the developers or others;
- Which are mutually reinforcing, dependent, or exclusive;
- Employer-sponsored mitigation measures.
- Scope/level of application; Costs (dollar, other);
- Benefits (traffic, other).

In order to help gauge which mitigation measures might be the most effective, it would be helpful to have an analysis of the traffic impacts of individual or combined mitigation measures.

Summary: The summary would benefit from charts and tables. For example, the summary states how many intersections will be at a given LOS; it would be helpful to know which specific intersections are affected.

General Final EIR requests: In addition to its interest in revised LOS analyses which take into account the methodological concerns expressed above and a closer look at view amenity impacts, Massport is interested in the potential for reducing the intensity of impacts at any given time. Existing legislative guidelines or tacit agreements among interested parties appear to prohibit above-ground parking on the Boston waterfront, but this case might present an important exception. For example, a Lesser-Scale Alternative which considers structured parking within the building could result in lower construction costs for parking, lower overall density, and fewer traffic impacts.

We recommend that the Final EIR explore lower densities, different proportions of land use mixes resulting in different peaking characteristics, different build-out schedules and/or combinations of mitigation measures which would allow key streets and intersections to realistically function at LOS D or better.

Massport believes the Fan Piers/Pier 4 projects will make significant contributions to the region's economic activity and that the developers deserve encouragement. Our major concern is that development keep pace with the ability of the roadway infrastructure to support both this new development and the growth of existing Seaport, commercial, and light industrial activities. In support of this goal, Massport will be pleased to cooperate in efforts to make necessary infrastructure improvements in a timely fashion. If you have questions, please feel free to call me.

Very Truly Yours,

David W. Davis
Executive Director
Massachusetts Port Authority

DWD/af
1190R

Boston

Raymond L. Flynn, Mayor

January 23, 1986

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JAN 24 1986
OFFICE OF THE SECRETARY OF
ENVIRONMENTAL AFFAIRS

Secretary James S. Hoyte
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02202

Re: EOEA #4426/4584 - Fan Pier/Pier 4 Development
Draft Environmental Impact Report

Dear Secretary Hoyte:

I am pleased to submit to you the following comments from the Transportation Department on the Draft Enviromental Impact Report (DEIR) for the proposed Fan Pier/Pier 4 Development.

Our comments address the overall transportation impacts of the project. These include traffic, parking, public transportation, pedestrian access, water transportation, and roadway improvements. We believe that the MEPA scope, which mandates a section outlining "traffic and parking impacts" versus "transportation impacts", narrows the focus of the analysis of the development as well as the possible mitigating measures. This format separates effects that should in fact be related by including traffic and parking effects, along with air quality and noise impacts, under environmental considerations; related construction traffic impacts in a separate section; pedestrian considerations under public access; and water trasnportation concerns under urban design. These are all elements of a balanced and comprehensive transportation and site access plan and should be treated as such. As the MEPA process is a critical opportunity for analysis and review by all interested parties, we suggest that this type of comprehensive transportation analysis be included as part of the scoping of developments of this size and impact and we stand ready to assist you in this effort.

We have a number of concerns about the transportation impacts of this project. In particular, we believe that the underlying assumptions and methodology underestimated the modal share of auto trips. Central to the methodology was the parking-constrained scenario, a model which assumed that given a shortage of parking spaces, people will rely on transit. This leads to a prediction of transit use comparable to downtown in an area currently served only by two local bus routes. Given the existing lack of convenient transit access to Fort Point Channel, a 60 to 70 percent transit share (for office workers during peak hours) seems unrealistic.

Richard A. Dimino, Commissioner, Traffic and Parking
City of Boston/City Hall Square/Boston, MA 02201

Along with these questions about the reliability of the traffic predictions, we have questions about impacts of the project on area roads and intersections, in downtown Boston, Fort Point Channel, and the adjacent South Boston community. We are also concerned about the proposed mitigating measures, specifically their feasibility, costs, and assignment of responsibility for implementation. Finally, we are concerned about the timing of the project's implementation and the relationship between construction and the infrastructure improvements necessary to support development at this scale.

Our specific comments follow.

Methodology and Assumptions.

(1) The DEIR employs a "parking-constrained" model for calculating the projected modal shares for project-related trips. Working from a fixed number of parking spaces, the model assigned all trips in excess of that number to public transportation. The model did not account for trip time, number of transfers, or quality of service in making these assignments. This approach is at variance with traditional transportation modelling techniques which assign people to modes based on a variety of factors, such as relative travel time, cost, and convenience.

(2) The DEIR assumes a public transportation share for peak-hour office workers that would be comparable to downtown development. Since the Fort Point Channel area does not have nearly the public transportation access of downtown Boston, this high transit share seems optimistic.

(3) The DEIR further assumes that all public transportation users will approach the site via the Red Line at South Station or the Blue Line at Aquarium, transferring from other lines in the system as appropriate. However, the analysis looks only at Red Line and Blue Line capacity without considering the impact of additional riders on the Orange and Green Lines, commuter rail, or express buses.

(4) From our discussions with the MBTA, we believe that the Red Line capacity figures are optimistic, assuming a 50 percent increase in capacity at current headways.

(5) Trip generation figures were in many cases derived from projects with better public transportation access. Of particular concern is residential, where vehicle-trips per dwelling unit were based on patterns observed at Harbor Towers, a project with signficantly better transit and pedestrian access than Fan Pier/Pier 4. Commercial truck activity was generated only for the Fan Pier development on the assumption that the same trucks would make multiple stops at both projects. Although this is not a major trip generator, we do not think this is appropriate.

(6) The public transportation needs of the Fort Point Channel background development are not fully identified nor assigned to any distribution system. The Final Environmental Impact Report should evaluate the impact of these trips in more detail.

(7) The assumptions for background development may not adequately reflect the future situation. In particular, we suspect that the development projections for Cabot, Cabot & Forbes underestimate the potential size of that project, particularly post-1995.

Roadway and Transit Mitigating Measures

(1) The DEIR traffic analysis assigned a number of project-related trips to three South Boston streets: A Street, D Street, and L Street. An alternative approach should be devised by the proponents where streets in the South Boston community are protected from both existing and future development access traffic.

In our discussions with the proponents, we have promoted the fuller investigation of the impacts of project-related traffic on these and other South Boston streets. The proponents have expressed a willingness to fund a neighborhood traffic improvement plan for the South Boston community that will look at these issues and we agree to undertake this planning effort.

(2) The DEIR provides very sketchy information about the traffic impacts of trucks and construction workers during construction. We would like to see a construction management plan that identifies these impacts and proposes appropriate mitigation measures.

(3) We wholeheartedly support the Fan Pier CAC's request for the proponent to examine the traffic benefits derived from the reopening of Dorchester Avenue between Broadway and Summer Street. This measure should be fully investigated in terms of the feasibility and cost of reacquisition from the U.S. Postal Service.

(4) The analysis with the implementation of the proponents' transportation mitigating measures with Third Harbor Tunnel/Depression of Central Artery results in several intersections with unacceptable LOS ('E' and 'F') in the AM and PM peak hours. Further measures to accommodate the projected vehicle trips or reductions in the vehicles trips generated is necessary. This analysis should be part of the FEIR and mitigating measures or reduction in trips identified.

(5) As part of the FEIR, the proponents should present an internal circulation plan, both at grade and possibly below grade, between the two development sites. A full circulation schematic is not included in the DEIR. Further, truck loading and unloading areas should be determined and fully illustrated, relating to the frequency and timing of deliveries. The layout and method of the parking facilities should be included to determine any queueing on the internal roadways and external roadways.

The proponents should provide a circulation plan that outlines plans for traffic flow between elements of the developments without requiring automobile trips on existing or relocated Northern Avenues. These plans may include water access (perhaps between the hotel and Pier 4 restaurant), underground access through the garages, and pedestrian access.

(6) The proponents should identify specific plans for employer-sponsored transportation management programs, such as transit pass subsidies, ridesharing incentives, parking rate structure. Additionally, the ability of the proponents to include these types of traffic mitigating measures as part of the leasing agreements and to enforce them should be stated.

(7) The proponents should provide more information on the feasibility of the proposed shuttle bus system, including estimates of costs, responsibility for operation, realistic equipment requirements, headways and the impacts of using existing Northern Avenue and Summer Street for the loading and unloading of passengers from this system. Additionally, shuttle buses from neighboring developments should be included in this analysis.

(8) Critical to the reality of the implementation of the proponents' traffic mitigating measures is the identification of several unknown factors and information. These include: the agencies and community representation necessary to cooperatively address these projects, the identification of issues to be resolved within each of these mitigating measures, the process and timeframe needed to undertake these measures, cost estimates and funding sources needed and feasibility and level of commitments necessary. We would like the proponents to outline the information necessary to implement the roadway improvements, enforcement, and transit improvements that they suggest will mitigate the impacts of this project.

Water Transportation

(1) The DEIR does not fully investigate the use of water transportation at the site. We would like to see more information about this mode of transportation and anticipate that part of the FEIR will include the results of the proponents' water transportation study being undertaken in a cooperative arrangement with the State Interagency Coordinating Committee. The information presented in the DEIR should more fully address the feasibility and impact of providing additional water transportation landing facilities along the Fan Pier.

A complete delineation of the terminal facilities within the project area which can provide for intermodal transfer from commuter boats to buses, from parking and dropoff/pickup areas to water taxi, and airport water shuttle should be identified.

We are particularly concerned with the proponents' plans to use existing Northern Avenue for drop-off and pick-up of passengers for school buses, tour buses, etc. These activities should be accommodated on-site. A more complete delineation of water transportation usage and related landside access modes to these facilities should be included.

(2) How does the Pier 4 Coastal Cruise landing relate to Massport's Cruise Terminal?

(3) The FEIR should identify the kind of boats and their prospective uses that can utilize the canal passage under the two proposed bridge height scenarios, that is a 16 foot highwater bridge clearance versus a 8-foot highwater bridge clearance.

Conclusion

To address the concerns identified above, the developers should propose a new combination of roadway, parking, and public transportation access mitigating measures. The Final Environmental Impact Report should identify these measures and evaluate their feasibility and impacts as mitigating measures. We enclose a copy of the City of Boston's proposed transportation access program for the Fort Point Channel area as measures the proponents should consider and analyze for their mitigating effects.

Finally, we believe that development should be phased to the availability and timing of the transportation infrastructure improvements to provide adequate access to the site. It may be appropriate to assume completion of certain short-term improvements, like the new Northern Avenue Bridge, relocated Northern Avenue, and repaved A Street. As part of the Fort Point Channel transportation access program, the City has identified the timing of these improvements which assumes full cooperation and attention by all of the agencies involved which Mayor Flynn communicated to Secretary Salvucci (see attached letter). However, the existence of the Third Harbor Crossing/Depressed Central Artery should not be assumed for completion by 1995.

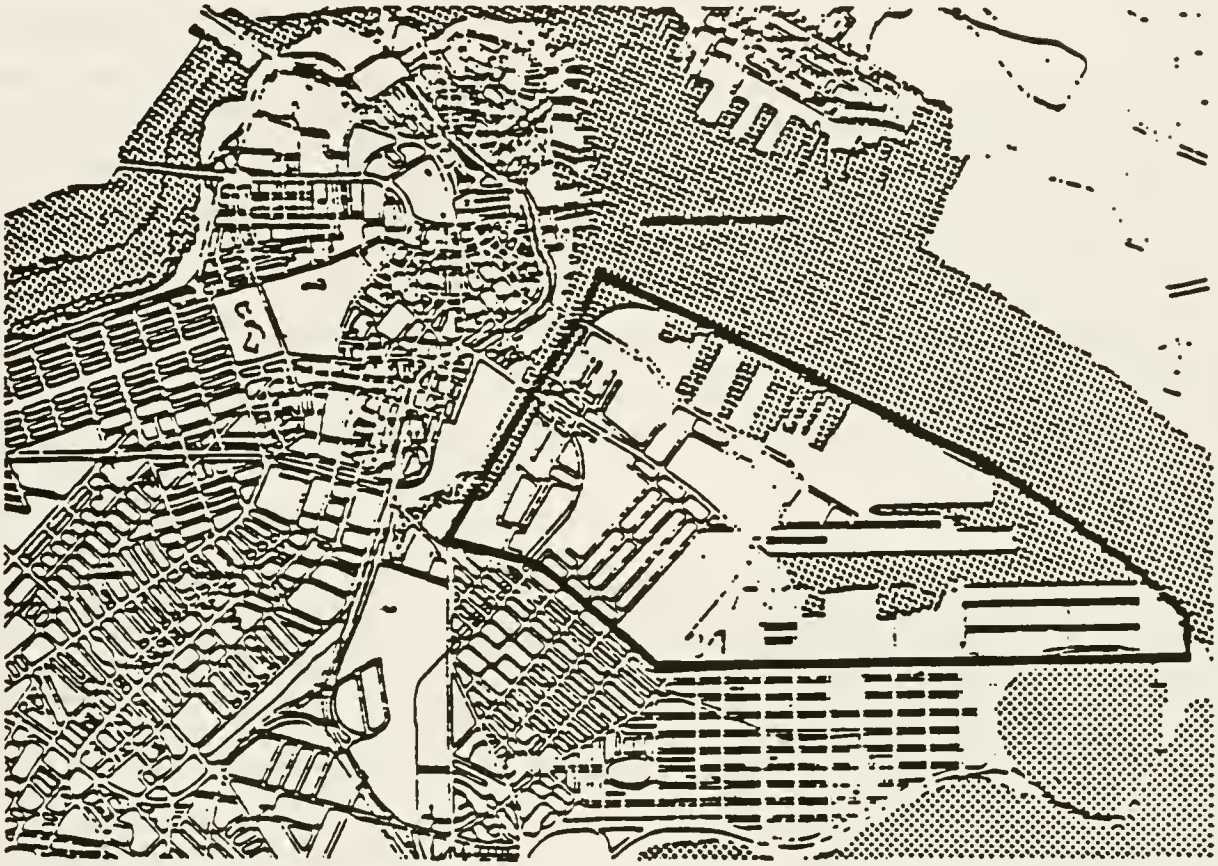
The master plan assumes private construction of many costly infrastructure improvements which will be constructed in phases. The Final Environmental Impact Report should identify a phasing program for the development which is consistent with the timing of these private infrastructure improvements as well as the public roadway and transit infrastructure improvements necessary for acceptable access to the development and traffic mitigating measures impacting the surrounding area and South Boston residential community.

Sincerely,

Richard A. Dimino
Commissioner

RD/SS-R/SB/1333j

TRANSPORTATION A FRAMEWORK FOR IMPROVED ACCESS



Fort Point Channel:

A Case Study

JANUARY 1986

City of Boston
Raymond L. Flynn, *Mayor*

Transportation Department
Richard Dimino, *Commissione*

TRANSPORTATION: A FRAMEWORK FOR IMPROVED ACCESS

Fort Point Channel: A Case Study

Planned for Fort Point Channel

The presence of six hundred vacant and underdeveloped acres close to the downtown business district, Fort Point Channel is a tremendous resource for the City of Boston. Significant development is already underway, and more is planned for the next 20 years. Guiding further development in this area poses a challenge and an opportunity to balance public responsibilities and private interests. The planning process must address questions of density, access, and provision of transportation improvements.

The Third Harbor Tunnel and other arterial improvements will dramatically improve highway access to the area, yet comparable transit infrastructure has not received adequate attention. The City seeks to redress this imbalance by proposing a number of transit and transportation management options which will complement the arterial network.

Public Transportation

Public transportation is the backbone of Boston's transportation system. During morning and evening rush hours, about 65 percent of the people heading to downtown Boston use public transportation. As the Fort Point Channel area is developed, more and more people will seek access to that area for jobs, shopping, and residential trips. Current public transportation service to Fort Point Channel is minimal, limited to a few bus routes. Public transportation serving this part of the City needs to be developed.

Some short-term improvements to public transportation service to the area, anticipated for 1990, include:

- Lengthen the platforms on MBTA Red Line to allow longer trains and thus increase capacity.
- Shuttle buses between transit stations and development sites in the area.
- A people mover loop to distribute passengers from South Station to the piers and to move drivers who park at new garages to be developed at exit ramps from the expressway network.

Longer term options, some of which are still in the early planning stages and are not expected before 1995, include:

- Completion of South Station Intermodal Facility
- Development of a transit connector from South Station to Logan Airport, through the Fort Point Channel area

Transportation Systems Management

An important component of the City's transportation management program is preparing neighborhood transportation studies to identify local traffic, parking, and access issues. The Fan Pier/Pier 4 developers have agreed to support a transportation study for the South Boston community.

Other management measures planned for Fort Point Channel include:

- Implementation of identified neighborhood traffic improvements
- Installation of new/upgraded traffic signals
- Repaving of 'A' Street

Highways, Arterials, and Bridges

Improving and upgrading critical roads, intersections, and bridges can improve the flow of traffic and enhance safety. Given the projected traffic increases in the Fort Point Channel area, such improvements are vital. Plans currently underway for improving roads and bridges in the area include the following.

Roadway Construction:

- Complete construction of the Haul Road along the old Conrail right-of-way
- Construction of relocated New Northern Avenue, Sleeper Street and Seaport Access connector roadway inbound between Old and New Northern Avenues
- Construction of Northern Avenue connector roadways, including Pittsburgh Street, Farnsworth Street, and Old Northern Avenue
- Construction of the Seaport Access Roadway and Connector roads
- Construction of Third Harbor Tunnel
- Depression of the Central Artery

Bridge Program:

- Rehabilitation/reconstruction of:
  - Congress Street Bridge
  - Summer Street Bridges
  - West 4th, 5th, and 6th Street Bridges
  - Northern Avenue Bridge

Parking

As traffic increases in Fort Point Channel, so will demand for parking spaces. The City seeks to balance this growing demand for parking while addressing concerns about air quality and traffic congestion.

Strategies to implement these goals include:

- Construct 3,000 additional spaces at South Station and along the old Colonial right-of-way, designed with direct ramps to the highway system and linked to a people mover for distribution.

- o Reserve a percentage of project-related spaces for midday short-term users.

- o Reserve a percentage of project-related spaces for vanpools and car-pools.

- o Introduce pricing polices that encourage optimum use of spaces and ridesharing.

Alternative Modes of Transportation

The location of the Fan Pier/Pier 4 projects makes them ideal candidates for certain alternative modes of transportation, particularly water transportation and pedestrian access.

The City is encouraging the developers to explore the use of water transportation in connection with their project. Water taxis and shuttles, commuter service, and private boats all can play a role in providing access to this waterfront site.

Harborpark has recently joined the Freedom Trail as a prominent component of the waterfront pedestrian landscape. Public pedestrian access to the sea will play an increasing important role in Boston. The Fan Pier/Pier 4 developments will be providing such access for pedestrians.

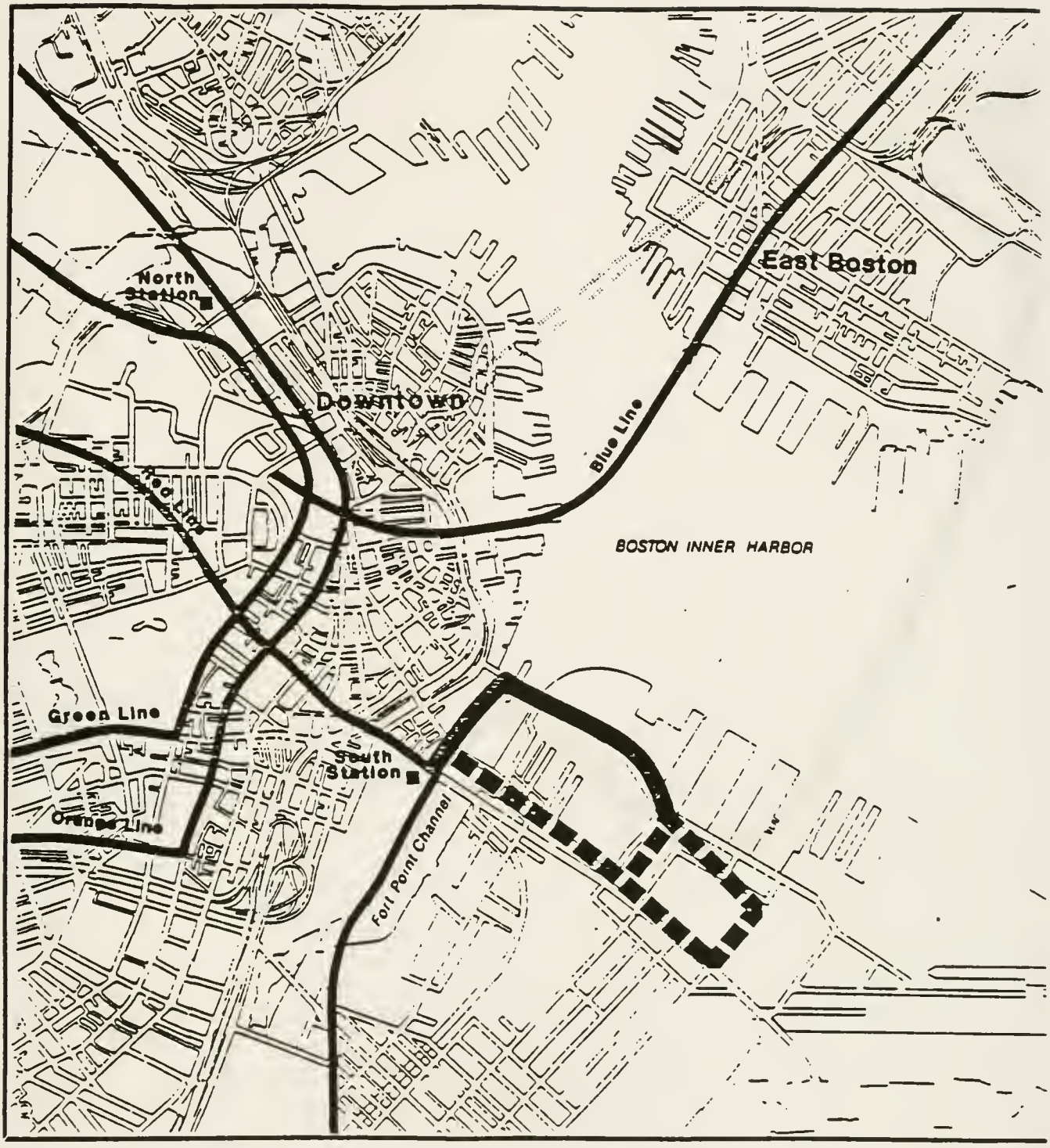
	TRANSIT	ROADWAYS
By 1990		
	* MBTA red line platform lenghtening/capacity increases	* Haul Road
		* Neighborhood Traffic Improvements
	* Shuttle buses to development sites	* New/upgraded signals - Harbor & Summer - 'D' & W. Seventh - Dorchester Ave. & Fr. Anthony Sonjin Way & Maj. O'Connor Way - 'E' & West Third - E. Eighth & 'L" - L & Fifth Street
		* Repaving A Street
		* Congress St. Bridge
		* Summer St. Bridges
		* New N. Avenue Bridge
		* New N. Avenue, Sleeper Street, and Seaport Access Connector between New/Old N. Avenues
	— —	* W. 4th, 5th, 6th, Street Bridges
By 1995		
	* South Station Intermodal Facility	* Connector Roads - Pittsburgh Street, Farnsworth Street, & Old N. Ave.
	* Red Line Loop	* Seaport Access Connector Roads
		* South Boston Bypass
	* People Mover	* Seaport Access Roadway
By 1995+		
	* Blue Line Connector to Airport	* Third Harbor Tunnel
		* Central Artery Depression

Red Line Loop

■ ■ ■ Proposed Red Line Loop
━━━ Existing MBTA Transit Lines

- 1 or 2 or 3 new stations
- Delays to Red Line users
- Rail rapid transit
- $100-200 million

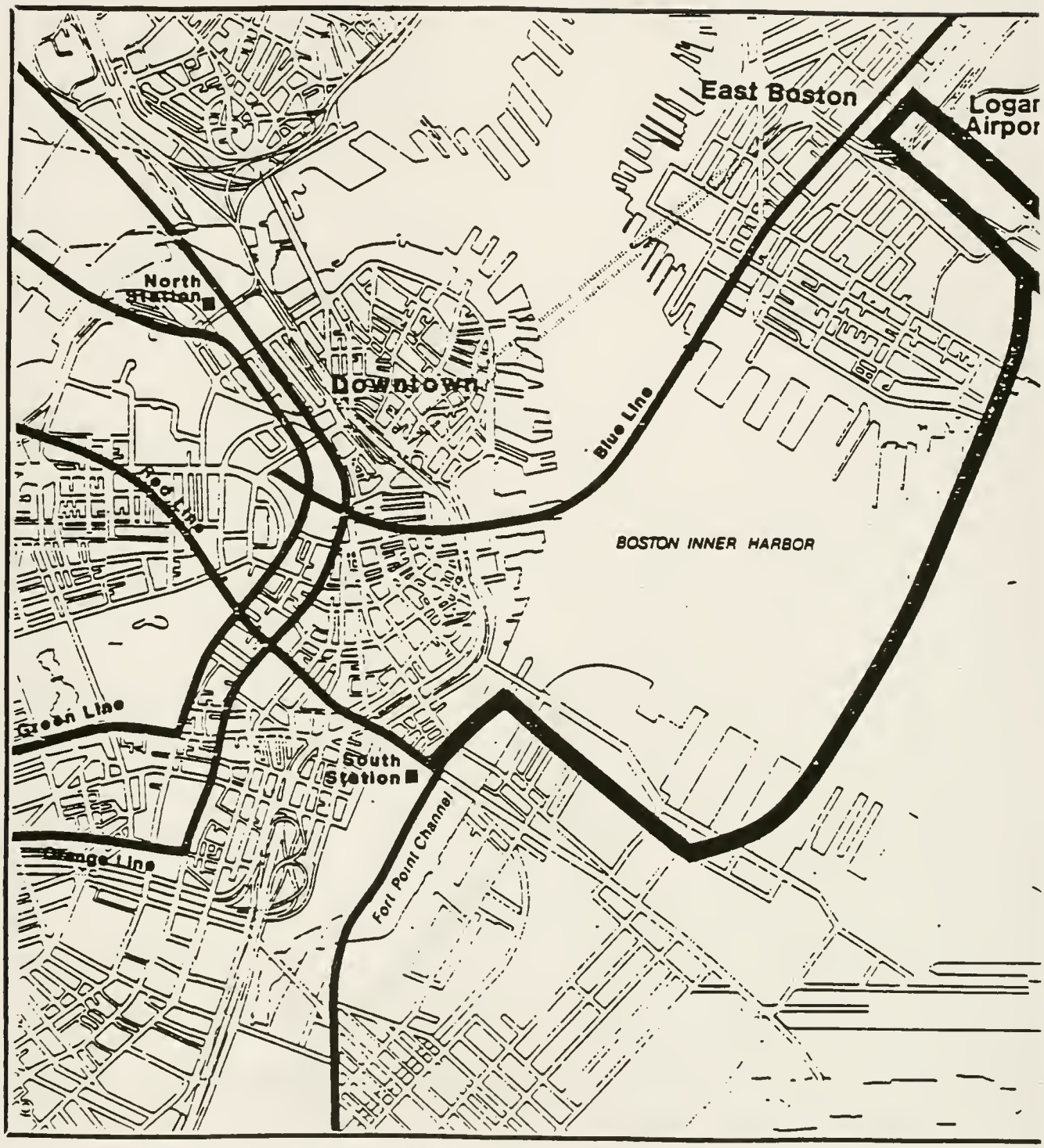
Fort Point Channel Shuttle/Loop



Initial Shuttle / Loop
Loop Extension
Existing MBTA Transit Lines

- Simple 0.9 mile shuttle can be built quickly, privately ($15-30 million)
- 2.2-mile loop can be extended in stages, one-way or two-way
- People mover

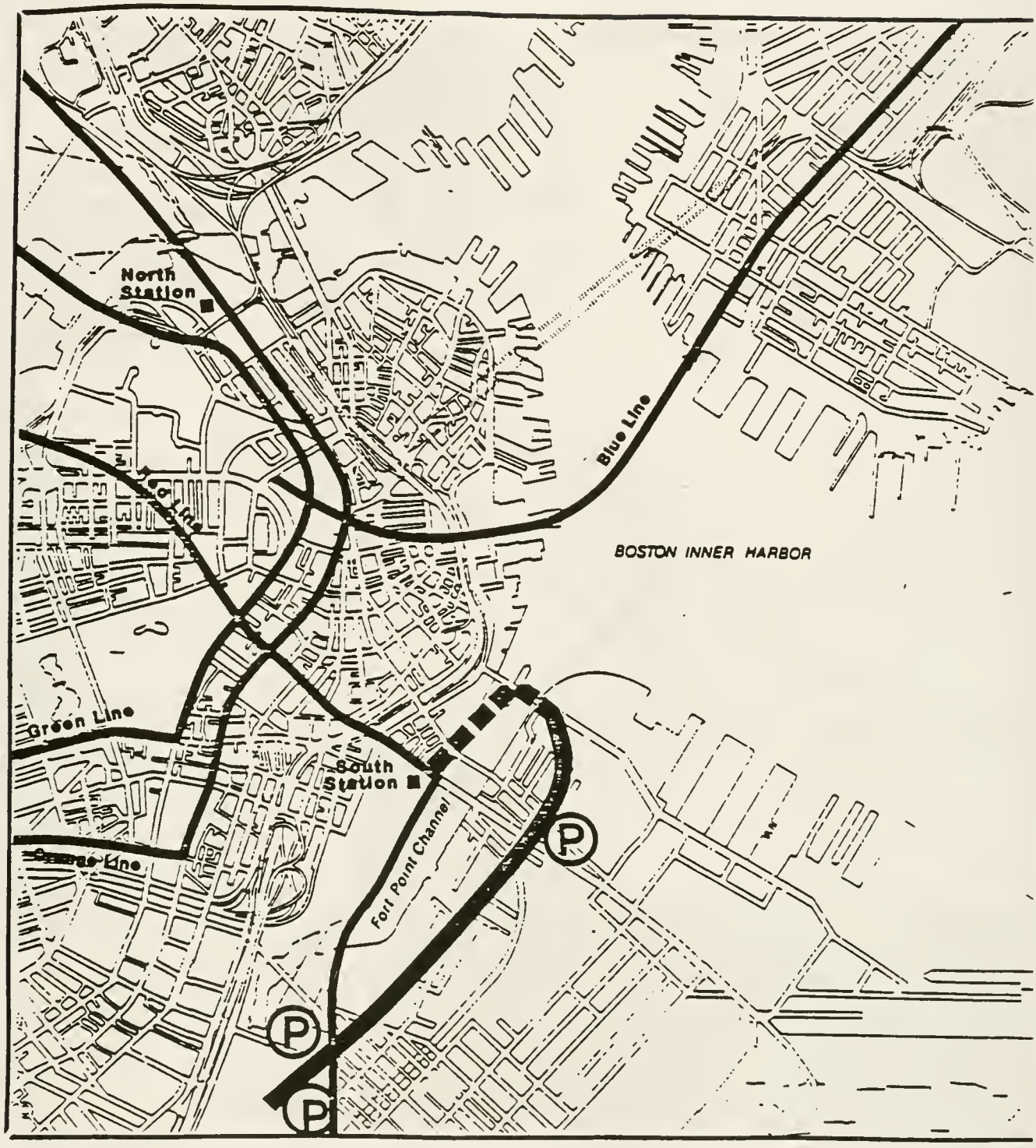
New Airport - Downtown Link



Existing MBTA Transit Lines
New Airport-Downtown Link

- Airport to South Station ($250-400 millior
- Rail or people mover

Rail Cut / Parking Link



Rail Cut / Parking Link

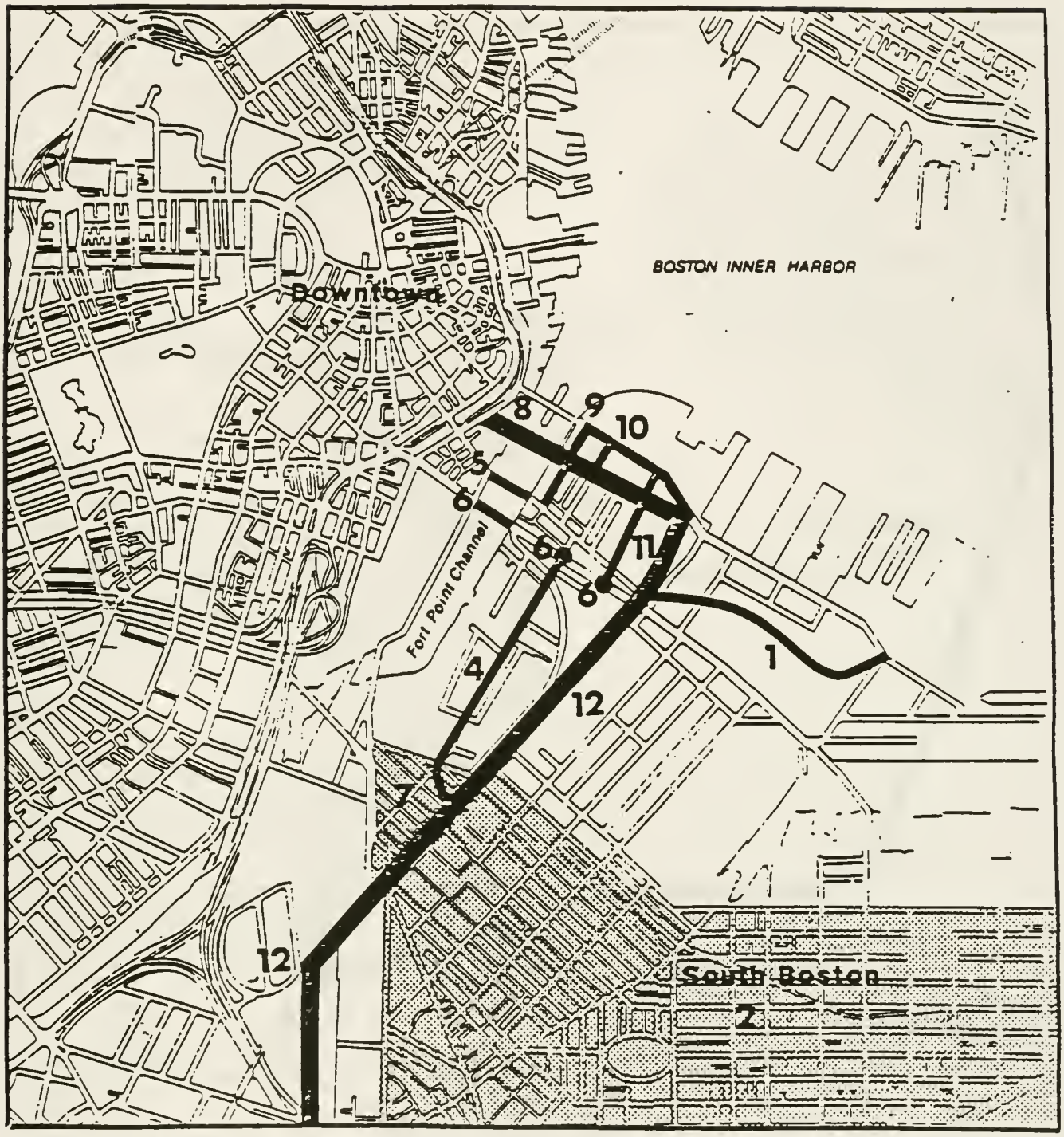
Possible inclusion of link to South Station

Existing MBTA Transit Lines

(P) Remote parking near x-way ramps with easy transfer to a people mover

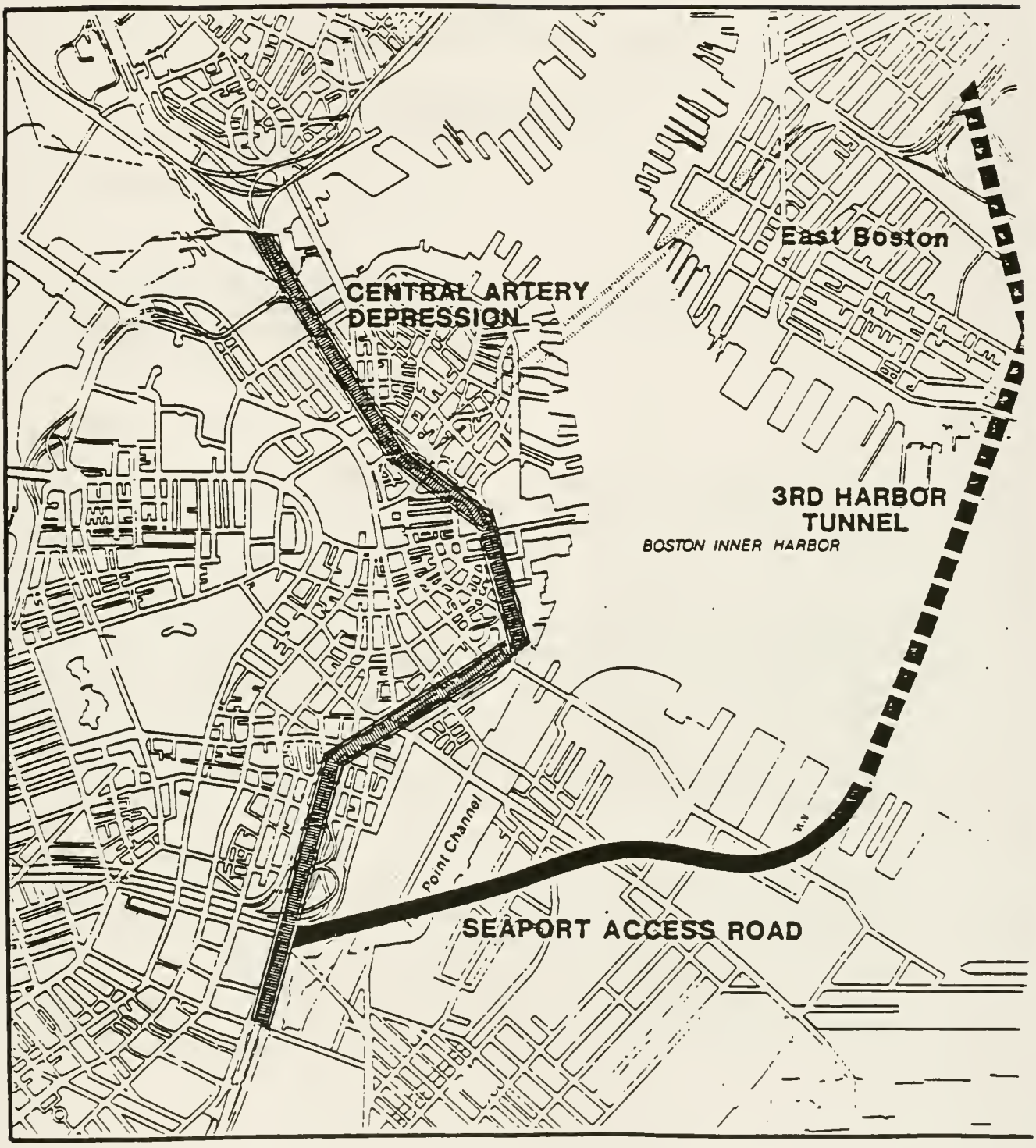
- Link cheaper remote parking to new developments (1.7 miles; $40-100 million)
- Extensions along Central Artery and/or Midlands
- People mover

South Boston Short Range Roadway Improvements



1. Haul Road
2. Neighborhood Traffic Improvements
3. New/upgraded signals
   - Harbor & Summer
   - "D" & West Seventh
   - Dorchester Ave. & Fr. Anthony Sonjin Way & Maj. O'Connor Way
   - "E" & West Third
   - East Eighth & L
   - L & Fifth Street
4. Repave "A" Street
5. Rehab/Reconstr. Congress Street Bridge
6. Rehab/Reconstr. Summer Street Bridge
7. Rehab/Reconstr. West 4th/5th/6th Street Bridges
8. New Northern Avenue Bridge
9. Relocated (new) Northern Avenue, Sleeper Street and Seaport Access Connector between new & old Northern Avenue
10. Connector Roads
    - Pittsburgh Street, Farnsworth Street, and old Northern Avenue
11. Seaport Access Connector Roads
12. South Boston By-pass

Long Range Roadway Proposals



- Seaport Access Rd. (approx. .6 Bil.)
- Third Harbor Tunnel (approx. .7 Bil.)
- Central Artery Depression (1.3 B.)

  Total Cost 2.6 B.

CITY OF BOSTON · MASSACHUSETTS

OFFICE OF THE MAYOR
RAYMOND L. FLYNN

January 15, 1986

Mr. Frederick P. Salvucci
Executive Office of Transportation and Construction
State Transportation Building
10 Park Plaza
Boston, MA 02216-3969

Dear Mr. Salvucci:

I am writing to request your support in directing the implementation and of a phased program of comprehensive transit bridge and roadway improvements for the South Boston and Fort Point Channel area.

As you are aware, the impacts of proposed development on Massport property, the Fan Pier and other development in the area require that a comprehensive transportation program for South Boston be initiated. I have enclosed such a transportation plan which the City submitted to the South Boston Community at a Fan Piers Advisory Committee meeting on Tuesday evening. This plan identifies road, bridge and transit improvemnts which will be needed to address existing and projected demands for access.

Your support is requested in order to ensure that these projects receive the priority and inter-agency coordination which is needed to provide the improvements on the time schedule which we have proposed. The Fort Point Channel area is key to the development of the City. It holds the potential for thousands of jobs. It will support the production of housing and new revenues. It is essential to maintaining the economic miracle of Massachusetts

The key projects requiring your attention are:

- o South Station Intermodal Facility
- o Fort Point Channel people mover
- o Red line loop
- o Blue line connector to the airport
- o Northern Avenue Bridge, roadway and related street improvements
- o South Boston bypass
- o Seaport access roads
- o Congress, Summer, w 4th, 5th & 6th Street and related Bridges

I have directed Commissioner Dimino to act as my liaison with you on the implementation of this South Boston Transportation Plan. We are confident that with your leadership these improvements will be accomplished. I look forward to your support of this comprehensive program to serve the port of Boston and the adjacent residential communities and maintaining the economic miracle of Massachusetts.

Sincerely,

Raymond L. Flynn

Raymond L. Flynn
Mayor

Attachment(s)

cc: James O'Leary
David Davis
Robert Tierney

MASSACHUSETTS
BAY
TRANSPORTATION
AUTHORITY

Ten Park Plaza, Boston, MA 02116

January 23, 1986

RECEIVED

JAN 24 1986

OFFICE OF THE SECRETARY OF
ENVIRONMENTAL AFFAIRS

Mr. James Hoyte, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street - 20th Floor
Boston, Massachusetts 02202

Attention: Mr. Steve Davis
MEPA Unit

Subject: EOEA No. 4426
Draft Environmental Impact Report (DEIR)
Fan Pier/Pier 4 Project

Dear Mr. Hoyte:

Transmitted herewith, for your consideration, are the MBTA's comments on the DEIR for the above-referenced project. The Authority has reviewed this document carefully and notes the following observations:

The transporation system in the target area is currently under review by the MBTA, in conjunction with the I-90/I-93 Project. The MBTA has initiated a consultant selection procedure to choose a team which will study the implications of the I-90/I-93 Project and the long-term development of the Fort Point Channel/South Boston Waterfront on the transit network in that area. Also being reviewed is South Station and airport access.

Of more immediate concern is the bus service necessary to accommodate the proposed Fan Pier development.

From a transportation perspective, the "Medical Area" is similar to the Fort Point Channel area. The Medical Area, located adjacent to a neighborhood outside of downtown with limited transit service and insufficient parking, faces an influx of thousands of employees and visitors each day. The area dealt with their commuting problems through the creation of MASCO, an entity funded by member institutions, which spends considerable effort and money "complementing" MBTA service. MASCO's services include their own shuttle bus system, from Harvard Square and from Allston and Kenmore Square, where they provide "satellite" parking lots. They also encourage MBTA use by providing their own attractive bus shelters and by selling passes.

Another important similarity between MASCO and the Fort Point Channel developments is that a small number of institutions or building owners represent thousands of employees, making joint planning easier than when many companies are involved. Therefore, if this and subsequent Fort Point Channel developments are to achieve their transit use goals, an association of Fort Point Channel developers should be considered in order to help manage the commuting problems brought about by the millions of square feet of office, industrial and convention space expected to open along Northern Avenue in the next ten or so years. Management means marketing MBTA services, as well as providing "complementary" services, if necessary, to meet Fan Pier's projected transit usage of 40% in a district without direct rapid transit service.

In addition to the foregoing, the following specific comments are offered:

o The proposed shuttle route shown on p.35 in Technical Appendix 1 would be appropriate for the developers to operate, but not for the MBTA since it exclusively serves the Fan Pier and Pier 4 developments and neglects others further down Northern Avenue.

o The calculation of the number of buses required for this shuttle (p.36) uses 76 passengers/bus, which represents worst-case crush capacity. A peak period planning standard of 60 passengers/vehicle (150% of the seated capacity on the new RTS II buses) should be substituted.

o On a similar note, Table IV. 1-8 uses 244 passengers/Red Line car to calculate a total line capacity of 23,424 during the peak hour. However, this ultimate maximum number of passengers/vehicle does not allow for efficient loading and unloading of trains. As the dwell time in each station increases, train headways deteriorate and our through-put plummets, so it is impossible to carry crush capacity on each train and yet maintain the headways shown in this table. A planning standard of 180 passengers/train should be used instead.

In summary, long range area transit services will be reviewed by the MBTA in conjunction with the I-90/I-93 Interchange Project. Additionally, the developer should consider the following mitigating measures:

- Operation of a privately funded bus service, either alone or in conjunction with other area property owners

- Provision of bus shelters

- Subsidy and distribution of MBTA passes

- Use of variable work hours

- Promotion of transit services

Thank you for your consideration of the above comments for inclusion in the Final EIR. Should you have any questions, please do not hesitate to contact me at 722-3152.

Sincerely,

Donald J. Kidston

Donald J. Kidston
Project Manager-Development

cc: F. M. Keville
J. K. Leary, Jr.
C. B. Steward
J. C. Aiello
J. A. Chmielinski
E. Collins

Boston Educational Marine Exchange
54 Lewis Wharf · Boston MA 02110 · 617-523-7611

23 January 1986

The Secretary
Executive Office of Environmental Affairs
Leverett Saltonstall Building
100 Cambridge Street
Boston, MA 02202
Attn: MEPA Unit

RECEIVED
JAN 24 1986
OFFICE OF THE SECRETARY OF

Dear Secretary Hoyt:

The Boston Educational Marine Exchange is a 10-year old, non-profit organization of more than 200 members who care about Boston Harbor and its better utilization. Carl Koch, our President, and Jeanne McQuilken, Board member, have been active participants on the Civic Advisory Committee reviewing the Fan Pier and Pier IV developments. We are grateful to MEPA and the Boston Redevelopment Authority for giving us this opportunity to have informed input into this exciting project. We are especially grateful to Harry Spence of HBC Associates, Ellen Watts and Anthony Athanas of the Boston Mariner Company, and architects Diana Balmori of Cesar Pelli Associates and Michael McKinnell and Gerhard Kallmann of Kallmann, McKinnell and Wood, who presented the development plan to "Exchange" members on January 13, 1986.

Our comments on the Draft Environmental Impact Report should be read in light of our general enthusiasm for the design concept. We especially like the lagoon and the plazas surrounding it, and see this as a wonderful new place for Bostonians to enjoy. We appreciate the attention given to water-related uses, and we hope to continue being involved as these uses are planned and developed.

We wish that the City's zoning decision on this project could be postponed until after the final environmental impact report has been issued and reviewed. This is too important a project to push along too hastily.

Our comments have been organized along the lines of the framework of the Draft Environmental Impact Report and represent the views of our members. We are especially concerned about the massive, downtown scale of the development, its timing considering infrastructure needs, quality of the public spaces, need for welcoming access to them, and the water-related uses of the project.

I. Summary

Permits and Approvals

Primarily due to concern about traffic impacts, we suggest that the EIR should present alternative permit-granting mechanisms that might be used by city and state permitting authorities to control the phasing of development so that the development timetable is in phase with the city's and state's timetable for infrastructure improvements.

III. Development Alternatives

What is presented as lower-scale alternatives for both the Fan Pier and Pier IV projects is too massive and out-of-scale for the site. We disagree with the concept of extending downtown-scale development into the Fort Point Channel waterfront. We agree with the design standards set forth by the Boston Redevelopment Authority for this area in Harborpark, Interim Standards for the Inner Harbor that call for no higher height or density than that of the existing Boston Wharf Company buildings (70-90 feet). We would like to see a truly lower scale alternative with floor area ratio reduced by at least one-third. Better to have shorter, less massive buildings and perhaps less, but higher quality public space.

IV. Environmental Issues - Traffic Related

1. Commuter Boat Service, Water Shuttle and Water Taxi Service

We are glad to see attention given to water transportation as a means of mitigating traffic related impacts. We hope the final EIR will include more definitive information on the feasibility of these alternatives. We suggest that the proposed docking areas be mapped and mentioned in this section, as well as in the Design Section.

2. Parking for Recreational Purposes

Although the report addresses the need for parking generated by retail uses on the site, it does not specifically address parking for those who come to this area to enjoy the public open spaces, the excursion boats, and nearby museums. It is now relatively inexpensive for visitors to park in this area on weekends. We hope some provision can be made for inexpensive weekend parking so that residents of Boston's neighborhoods will be encouraged to come and enjoy this new urban park.

3. Traffic Impacts Generally

We are concerned about the severe traffic impacts that are anticipated, particularly in the absence of new roadway construction. Attention should be given to quantifying the level of development that can be permitted in phases conditioned upon the level of infrastructure improvements that the city and state are certain to undertake.

There is talk of opening Dorchester Avenue along Fort Point Channel to through traffic in order to alleviate traffic impacts. We would prefer to see a pedestrian walkway alongside the existing U.S. Post Office driveway, not a new roadway along a waterfront which has recreational potential.

V. Environmental Issues - Design Related

1. View from Northern Avenue at Sleeper Street

We are concerned about the view of the site from the direction of public approach. It seems that the buildings extending along Northern Avenue will wall off the view of the water and disinvite people to use the public space. Although we agree with the concept of urban blocks rather than buildings set back on plazas, we think there should be an inviting plaza at the site edge near the old Northern Avenue Bridge to mark an entrance to the park instead of the proposed Marine Services/Office building. We like the concept of providing a structure for marine services, but are not clear what the marine services entail and whether a small building, pavillion or kiosks would be practical. We hope the presentation of a "real" lesser-scale alternative will consider this concept. At least there should be view analyses from this direction of all alternatives being considered.

2. Quality of Public Spaces

The shadow studies are at a scale that makes it difficult to see the extent of shadowing of public spaces by buildings. We would like to see shadow conditions of a "real" lesser scale alternative as well as better computer drawings of all alternatives. We are particularly concerned about the canal and the open space along the edge of the Fan Pier.

There should be additional information about the canal concept. Will the canal and its pedestrian edges be appealing, or will they be cast in shadow, canyon-like, lacking in human scale and intimidating? Our members, many of whom are boaters, are enthusiastic about the canal; but we would like to see perspective drawings in addition to View C to get a better idea of what it will be like. We are concerned about water flow and debris entrapment. We want more information about how the canal will work as a boat channel and how boat traffic will be controlled. Attached is a letter from one of our members raising these issues.

Also, what attractions are proposed along the Fan Pier's edge to make this area appealing to visitors? For example, the harbor seal pool and recessed waterfall pool in front of the New England Aquarium are such attractions.

3. Impacts on Fort Point Channel

Will there be any adverse impacts on marine-related uses now located on Fort Point Channel or uses such as a public marina and breakwater landing that might be located there in the future. Fort Point Channel has great potential for the safe harborage of boats; this potential ought not to be jeopardized.

4. Continuous Walkway Around Harbor Edge

It is not clear that there is a continuous walkway around Pier IV. There should be consideration of an alternative that would provide this.

5. Water-Related Activities

We are concerned that the Lagoon be used for boating that is primarily public rather than private, such as:

- o Reasonably priced transient docking for pleasure boats
- o Landings for:

  Water taxis/shuttles/water buses

  Launches engaged in transporting people from moored boats

  Private boat and charter vessel drop-off and pick-up of passengers

- o In-water boat shows, regattas and other boat-oriented festivals
- o Moderately priced club sailboating
- o Motorboats for rent

We would like consideration given to making the harbor edge of the Fan Pier useful and available for tie-up of boats with necessary provisions installed along the granite seawall, such as fender piles, bollards and ladders or appropriate facilities recommended by marine experts.

VI. Environmental Issues - Construction and Operation

1. Harbor Debris Problem

Construction is apt to generate floating debris and navigational hazards in the harbor. This should be avoided as Boston, unlike other ports,currently has no debris clean-up program.

2. Construction Barges

As a means of alleviating truck traffic during construction, consideration ought to be given to employing barges to cart materials to and from the site where applicable. Perhaps this could be tied into plans for barging materials in connection with Deer Island Sewage Treatment Plant construction.

3. Effects on Wildlife

Will excavation and construction cause the destruction of habitats for rats, causing them to seek homes elsewhere in the area? We would like to see a plan for rat control if this is likely to be a problem.

4. Sewage

Just as with traffic impacts, controlling the timing and phasing of development to coinside with infrastructure improvements should be considered to alleviate sewer system impacts.

With regard to impact on combined sewer overflows, more definite information should be provided.

Thank you for the opportunity to respond to development plans for this important piece of harborfront. The "Exchange" looks forward to continuing progress on a project which we hope will be an asset to the City which Bostonians and others will be proud of and enjoy for years to come.

Sincerely,

Jeanne McQuilken PW

Jeanne McQuilken
BOSTON EDUCATIONAL MARINE EXCHANGE

Enclosure

cc: Larry Koff, BRA

Boston Educational Marine Exchange

MEMORANDUM

To: Pat Wells

From: Fan Callahan (RC)

Re:Fan Pier Presentation

Date:January 14, 1986

Congratulations on organizing an excellent meeting on the planned development in the fan pier area. I thought everything went very well and I found the meeting to be most informative.

I would like to comment on a couple of points that you may want to incorporate into the Exchange's remarks to the developers:

1. I am very concerned about the boat traffic in the canal. This area is relatively narrow for boat traffic which has less control than an automobile due to effects of wind, current and inexperienced operators. If the canal is as wide as Newbury Street(as stated) with two way traffic and "parking" on both sides then the actual navigable channel is quite restricted. The heights of the bridges will allow power boats of approximately 35 feet in length to transit the canal. These vessels will be interm. ed with much smaller craft and could make for considerable congestion and a potential hazard.

In addition, the canal traffic will continue through the basin area presenting a nuisance to marina dwellers thus decreasing the desirability of this spot for a permanent slip area.

Personal experience tells me that this area will be a tremendously popular area for cruising power boats to see and be seen. Certain peak times, such as every weekend in the summer, will represent high traffic periods requiring monitoring and enforcing of navigation regulations. Perhaps one way traffic is indicated.

2. Just a thought on the potential effect of a hot summer day at low tide in a canal with low flow characteristics. It could be a real bad smelling place!

CABOT, CABOT & FORBES
SIXTY STATE STREET, BOSTON, MASSACHUSETTS 02109

AREA CODE 617 722-8200

MEPA

RECEIVED
JAN 27 1986
OFFICE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS

January 23, 1986

RECEIVED
OFFICE OF ENVIRONMENTAL AFFAIRS

BY HAND

The Secretary
Executive Office of Environmental Affairs
Leverett Saltonstall Building
100 Cambridge Street
Boston, MA 02202

Attention: MEPA Unit

RE: Fan Pier/Pier 4 DEIR (EOEA No. 4426-4584)

Gentlemen:

Cabot, Cabot & Forbes is the owner of an approximately 22.4 acre development site located adjacent to the Fan Pier/Pier 4 property on the southerly side of Old Northern Avenue. We have the following comments on the Fan Pier/Pier 4 DEIR.

General

1. First, and most importantly, the DEIR credits CC&F with the development of 500,000 square feet of office space and 10,000 square feet of retail space (II-8 and Appendix). We expect and intend that our site will be developed to a density at least equal to the density of the Fan Pier/Pier 4 projects and other development projects in the Fort Point Channel area. Based on the approximate 4.9 floor area ratio projected for the Fan Pier/Pier 4 projects, we anticipate the development of up to 5,000,000 square feet of office space on our site. Indeed, the favorable location of most of CC&F's property with respect to the proposed Seaport Access Road and Seaport Access Road Connectors suggests that an even greater density is justified for our site. CC&F believes that the planning process now ongoing with respect to the Fort Point Channel area should take into account the full build-out of our property. This is especially important with respect to the transportation and utility infrastructure serving the Fort Point Channel area.

Transportation

2. Construction of the Seaport Access Road is essential to the long-term success both of development projects and of transportation systems in the Fort Point Channel area.

We support early construction of the Seaport Access Road Connectors to Congress Street prior to completion of the Seaport Access Road as recommended by the DEIR (IV. 1-110). Early completion of the connectors will minimize traffic impacts on Sleeper Street, Pittsburgh Street and Atlantic Avenue.

3. The DEIR proposes the extensive use of shuttle buses between South Station and the Fan Pier/Pier 4 site (IV. 1-113). CC&F believes that the magnitude of the proposed shuttle bus service may be unrealistic and unworkable. More than 40 shuttle bus trips would be required per hour during the afternoon peak hours between South Station and the Fan Pier/Pier 4 projects. The proposed number of shuttle buses may well clog the Fort Point Channel roadway network and curb frontage at South Station. It is not clear how the proposed service would be financed, or how committed the MBTA is to such proposed bus service. In general, we believe that there is need for a comprehensive public transportation/traffic plan for the entire Fort Point Channel area. We also believe that encouraging pedestrian access by constructing attractive pedestrian ways with limited street crossings along Fort Point Channel, Summer Street, New Northern Avenue, and Old Northern Avenue can be an important part of this plan.

4. The DEIR seems to propose the extension of Farnsworth Street between new Northern Avenue and Old Northern Avenue (I-5, III-8). (Although described as part of the DEIR project description, the extension of Farnsworth Street is not shown on the sketches contained in the DEIR traffic analysis and does not seem to have been considered as part of the traffic analysis.) CC&F sees no significant traffic function for an extended Farnsworth Street at this time. Since the construction of a number of other public roadways is proposed for CC&F's property, we oppose the extension of Farnsworth Street at this time through our site. If our future building plans in the immediate area of a potential Farnsworth Street crossing show such a crossing to be desirable in handling local traffic, then we would, of course, change our view, but the decision should be deferred until that time. In this connection, we also believe that Old Northern Avenue should be relocated along the northern edge of its existing right of way with the excess land created by its reconstruction given to CC&F as partial compensation for the proposed eminent domain takings for New Northern Avenue and the extensions of Sleeper Street and Pittsburgh Street.

5. The DEIR proposes that Old Northern Avenue be made one-way toward Fort Point Channel between the Seaport Access Road Connectors (IV. 1-19). CC&F endorses this proposal, which we believe to be the only workable solution for the Pier 4 entrance/exit intersection.

6. The efficient movement of traffic along New Northern Avenue and the Seaport Access Road Connectors is a critical priority. CC&F believes that all on-street parking should be

prohibited on New Northern Avenue and the Seaport Access Road Connectors (See IV. 1-99).

7. To minimize traffic and visual impacts, truck loading docks should not be located on Old Northern Avenue. The DEIR does not indicate the location of the loading docks proposed for the Fan Pier/Pier 4 projects. The DEIR also does not indicate the location of access and egress points for the proposed below-grade parking garages. In order to assess possible impacts, the locations of the loading docks and parking garage ramps should be identified.

Utilities

8. The DEIR indicates that the existing infrastructure for gas, water, sanitary sewer, and storm sewer service in the Fort Point Channel area will be inadequate to serve the level of anticipated development. CC&F urges that the relevant governmental authorities and utility companies plan now to provide utility service adequate to provide for all foreseeable development in the Fort Point Channel area. In particular, CC&F urges that the design for New Northern Avenue include underground utility lines sufficient in size to provide for all anticipated demands.

The Fort Point Channel area is the "growth corridor" of the future for downtown Boston. We believe that with improved transportation and utility infrastructure, the area holds tremendous promise for continued downtown growth and, at the same time, affords the opportunity for a comprehensive planning process that will enable any adverse environmental impacts to be minimized. The Fan Pier/Pier 4 projects are an exciting proposal which we endorse and which we believe will serve as a catalyst for sound and continued growth in the area. CC&F looks forward to working with the projects' proponents as well as the involved local and state agencies in the planning process.

Sincerely yours,

Geoffrey M. Smyth
Vice President

cc: Lewis H. Spence, HBC Associates
Ellen A. Watts, The Boston Mariner Company, Inc.
Commissioner Robert T. Tierney, MDPW
John P. Sullivan, Jr., BWSC
Richard Morrison, Boston Gas
Daniel A. Taylor, Esq.

RECEIVED

JAN 23 1989

OFFICE OF THE SECRETARY OF
ENVIRONMENTAL AFFAIRS

James S. Hoyte, Secretary
The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02202

RECEIVED

OFFICE OF THE SECRETARY
OF ENVIRONMENTAL AFFAIRS

Dear Secretary Hoyte:

This letter is commentary on the Draft Environmental Impact Report (EOEA #4426/4584) for the Fan Pier and Pier 4 Developments. As Boston's downtown continues to develop and become increasingly congested, we have become concerned about Boston's future economy and the viability of office and other downtown growth. In order for Boston's downtown to continue its growth, it needs to extend beyond its current borders.

These projects are of extreme importance because they provide for continued downtown development without aggravating the traffic and infrastructure problems that result from continued construction within the current downtown area. Because these projects are across the Fort Point Channel, we have many more opportunities for solving traffic and infrastructure problems than we would within the existing downtown.

Many members live in South Boston. Therefore, we have been worried about traffic problems in the community for a long time. Even though the Fan Pier and Pier 4 developments will be a small part of overall future traffic problems, we hope that the attention to traffic issues, resulting from their proposed development, will lead to solutions to long-term traffic problems in the South Boston Community.

To meet the area's growing needs, we hope that this project moves ahead. The proposed developments have a mix of uses that will help to meet those needs and provide a good opportunity for solving some critical problems that can not be solved in the existing downtown area.

Sincerely,

Martin Curry
Business Agent
Plasterers' Union, Local 10

EXECUTIVE OFFICE OF COMMUNITIES & DEVELOPMENT

MEPA

RECEIVED

JAN 23 1986

OFFICE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS

Michael S. Dukakis, Governor
Amy S. Anthony, Secretary

January 23, 1986

James S. Hoyte, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

RECEIVED

JAN 27 1986

OFFICE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS

ATTN: Samuel Mygatt, MEPA Unit

RE: Draft Environmental Impact Report
Fan Pier - Pier 4 Development

Dear Secretary Hoyte:

This office has reviewed the Draft Environmental Impact Report for the Fan Pier and Pier 4 developments in Boston. There are several areas of concern which should be given further attention in the preparation of the final report.

1. The current plan for Fan Pier reflects a high degree of homogeneity as an "upscale" extension of the downtown business district and waterfront. It uniformly proposes development of high rent office space, expensive hotels and high-market residences. The public's right to enjoy the tideland area to be occupied by the development is addressed through the provision of access rather than occupancy.

   I am concerned that the homogeneity of the development may deter from true public access to the tidelands regardless of the level of access amenity provided in the development. I feel that some degree of heterogeneity in occupancy of Fan Piers would help insure that the broader public interest is met.

   Accordingly, an attempt should be made to achieve a broader mix of community within the combined development. Provision should be made by the developers to produce housing units for a wider income range.

2. The proposed developments will have a real impact on the neighborhood described as Sub-area 3 which is bordered by the Fort Point Channel and includes Necco, Melcher, Sleeper and Farnsworth Streets. Boston Wharf owns approximately 6,200,000 square feet of built space, half of which is sued for marginal commercial and industrial related

Office of the Secretary
100 Cambridge Street, Room 1404
Boston, Massachusetts 02202
(617) 727-7765

activities. Conversion to residential use is already taking place.

The lower income residents of Sub-area 3, including an artists' community, will be impacted by the development of high cost housing on Fan Pier and Pier 4. Existing low and moderate income housing in this neighborhood must be protected and additional units of affordable housing must be provided in Sub-area 3.

3. The Fan Pier/Pier 4 projects could create 18,500 new car trips per day. At the same time, the development would displace some 2,500 existing downtown commuter parking spaces at the sites. Changes of this scale will have major impacts on traffic in adjacent neighborhoods. Unless the seaport access road and third harbor tunnel are built, traffic will prove to be a major problem for neighboring areas.

If you have any questions, please call James Malone, Deputy Assistant Secretary, at 727-7001.

Sincerely,

Amy S. Anthony
Secretary

ASA:kmc

COASTAL ZONE
MANAGEMENT

The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02202

MEMORANDUM

TO: JAMES S. HOYTE, SECRETARY, EOEA

FROM: RICHARD F. DELANEY, DIRECTOR, MCZM

DATE: JANUARY 23, 1986

RE: EOEA #4426/4584 - FAN PIER/PIER 4 DEVELOPMENT

The Massachusetts Coastal Zone Management (MCZM) Office has reviewed the Draft Environmental Impact Report for the Fan Piers/Pier 4 Development, the content of which is divided according to three basic categories: traffic-related issues, urban design issues, and construction/operation issues. In the case of traffic-related issues we have decided to forego comment at this time, not because we lack specific concerns but because we are confident that such concerns will be articulated effectively by state and local agencies more versed than we in the intricacies of transportation analysis -- including the MEPA Unit, EOTC, the Boston Traffic and Parking Department, and Massport. In addition, traffic-related issues (including air quality and noise) are only tangentially within the ambit of MCZM policies and are not likely to figure prominently in our consistency review under either 301 CMR 21.00 or M.G.L. ch. 91.

As to construction/operation impacts, we have a few more-or-less routine requests for information to facilitate our MCZM federal consistency review. Specifically, the FEIR should include:

(1) bioassay/bioaccumulation test results from the sediments to be dredged. This is required in order to determine whether or not these materials would be acceptable for disposal at the "Foul Area" marine disposal site;

(2) a detailed description of the mitigation measures proposed to reduce turbidity during dredging, sidecasting of dredged materials, and excavation (i.e. depth of silt curtains, etc.);

(3) a detailed description of the referenced water quality analyses that will be performed to monitor construction-related turbidity. Standards by which these analyses will be evaluated as well as mitigation measures to be employed during exceedences of these standards should also be discussed in depth;

(4) a discussion of construction-related vehicular access (trucks, supplies, etc.) over the old Northern Avenue Bridge during project construction;

(5) a detailed description of the storm drainage system for the combined project (separation/filtration facilities, pumping facilities, etc), as well as a proposed maintenance program for that system;

(6) a detailed analysis of potential upland sites for dewatering and disposal of the 1,000,000 cubic yards of excavate resulting from construction of the marina, canal, and underground parking.

As regards item (6) above, the proponents should be advised that because some of the excavated material may be salt-laden, locating an upland disposal site could prove difficult. In addition, the alternative of using the Boston "Foul Area" marine site is precluded by the fact that EPA has designated the site for disposal of dredged material only. The proponents may seek redesignation of this site, but it should be understood that sucha federal action would require separate federal consistency review by CZM, and could be a controverisal and time-consuming process.

Apart from these matters, chapter VI of the DEIR raises only one troublesome issue of potentially major proportion: that of sewage infrastructure. The DEIR states that "minor surcharges" during peak flow periods may occur in two existing sewers and one new sewer on Northern Avenue. In addition, during wet weather conditions wastewater from the site will contribute to the combined sewer overflow into Boston Harbor, although the increases in volume and/or rate of overflow due to this project have not been determined. The proponents have indicted that the FEIR will assess physical dimensions and overflow regulator structures and hydraulic gradelines at peak flow. However, considering the scope of this overall project one can surmise that the volume of sewage entering Boston Harbor via CSO's will be large under peak flow conditions. What's more, we understand that MWRA plans for a treatment facility for combined sewer overflows into Fort Point Channel are very much up in the air, and not "high on the Extended Portion of the FY 86 Massachusetts Construction Grants Project Priority List", as stated in the DEIR (VI.2-25). Thus, we feel it is incumbent upon the proponent to submit a mitigation plan for CSO impacts on Boston Harbor arising from the proposed development.

Our remaining comments relate to the issues of visual quality, shadowing, wind, public access, and water-related activities, all of which are addresed in the urban design chapter of the DEIR. The material in this chapter is particularly relevant to our participation in the chapter 91 review process, which is of great importance to the achievement of this agency's goals regarding urban waterfront revitalization. We are thus compelled to offer a more discursive response to the tidelands-related issues, one that includes a general statement on guiding principles as well as a set of specific recommendations relative to preparation of the FEIR. This is contained separately in the attached staff report, prepared by Dennis Ducsik (CZM Coordinator of Waterfront Planning/Regulation) and Harriet Diamond.

Let me say in closing that MCZM looks forward to working further with the proponents and affected state agencies to fashion a licensable development plan. In this regard, I encourage regular communication with the staff reviewers on the project (Ducsik and Diamond).

RFD/DWD/HMD:sla

COASTAL ZONE
MANAGEMENT

The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02202

Fan Piers/Pier 4 Draft Environmental Impact Statement: Urban Design Issues

A CZM Staff Report
Prepared
by

Dennis Ducsik

and

Harriet Diamond

January 23, 1986

Introduction

Few would disagree that the 25 or so acres comprising the Fan Piers/Pier 4 site will play a very special role in the future development of the South Boston coastal zone. Because these parcels and some other large, adjoining properties are essentially vacant, the opportunity exists to at once effect a major expansion of the downtown business district and to create an entirely new waterfront district which, in both form and function, is unlike any other around the Harbor.

While this opportunity excites the imagination in an unparalleled way, it also poses planning challenges of the highest order. Developing a city within a city has certain implications as to building height and density, mix of use, infrastructure investment and so on, and CZM is cognizant of the fact there are thresholds below which the goal of creating true cityscape may not be attainable. But there should be an equally important goal in the case of a seaside city like Boston, which is to ensure that the Harbor itself becomes an integral, functional component of the cityscape. For such to occur, CZM firmly belives that the waterfront must become a highly public place, a place where the people who live, work, and visit near the Harbor can develop a sense of communion with that invaluable natural asset. In our minds, then, the basic premises underlying the master plan for this project must be derived not only from a sense of the relationship that should exist between the built environments on either side of Fort Point Channel, but also from a sense of the relationship which should exist between the people of Boston and their Harbor.

What does it take, as a practical matter, to establish such a relationship? In our view, there are two fundamental requirements that must be met above all others. First, ample facilities for water-related activity must be physically available at or very near the water's edge. Be they drydocks, fish markets, cargo cranes or other accutrements of a working waterfront, or be they esplanades, ferry terminals, marinas or other amenities to foster public use and enjoyment of waterways, there must be something which establishes the shoreline as a legitimate destination. It must be a center for activity in which a cross-section of the citizenry can either participate directly or, at the very least, derive pleasure from observing the participation of others.

Next, both the water and the land's end must be psychologically accessible from numerous vantage points in the transitional area lying inland of the waterfront. Of what consequence are public amenities, especially for pedestrians, if they lie within a zone of inhospitable wind or shadow conditions, of obstructed view corridors, of or semi-private enclaves that create the impression (if not the reality) of being off-limits? In our experience, harborfronts with the most inviting presence tend to be those where the visual experience has been treated with the utmost deference. Within a few blocks or so of the waterfront, it shoudn't be necessary to ask a passerby where the harbor area is located; one should be able to walk to the nearest street corner and have the answer provided immediately by one's eyes!

The MEPA process, to its great credit, has been instrumental in

communicating the aforementioned principles to the Fan Piers/Pier 4 proponents, primarily through the agency of the EIR scope. That document included major sections on Public Access, Visual Impacts, and Wind Impacts, and was accompanied by ENF comment letters which reflected a high degree of sensitivity to these subjects on the part of a cross-section of organizational reviewers. Rare was the letter that did not stress the need for substantial open space for public recreational use, or for some form of water transportation services on-site. In addition, calls for the preservation of visual access to the Harbor -- from Northern Avenue and points south, as well as within the project boundaries -- were forthcoming not only from this office but also from the BRA, the Boston Environment Department, Cabot/Cabot/Forbes, and the Sierra Club (among others).

What was most noteworthy about the Fan Piers/Piers 4 scope, however, was the extent to which it stressed the need to explore the matter of urban design in the context of alternatives. Ordinarily it would not be necessary to recite specific provisions of the scope, but in this case they do bear repeating in order to highlight the unequivocal nature of the Secretary's directives. The most relevant excerpts, with editorial emphasis added, are as follows:

*page 5, item 3: "Evaluate alternative alignments and heights of buildings to maximize views of the harbor and downtown skyline from the site (in particular, from public areas on the site), from Northern Avenue, from the Headhouse and areas designated for public access on Commonwealth Pier 5, and points south".

*page 5, item 4: "Evaluate alternative building alignments, design elements and architectural features that would tend to make the site visually accessible from Northern Avenue, and would avoid creating a visual barrier."

*page 5, item 5: "Analyze the shadow impacts of the proposed development and the alternative alignments on ... the pedestrian areas on the site ..."

*page 14, item 2: [Study] alternative combinations of pedestrian, vehicular and water access to the public, including the provision of continuous public access along the waterfront".

*page 14, item 3: "[Study] alternative alignments and building heights to maximize views of the harbor and downtown skyline."

*page 14, item 4: "[Study] alternatives to increase visual accessibility to the site from Northern Avenue."

*page 14, item 5: "[Study] alternative massing to minimize wind impacts."

It is obvious from these statements that certain requirements were spelled out not once but twice, and even three times in connection with one issue (the need to promote visual accessibility from Northern Avenue). Such redundancy was a clear indication of how thoroughly committed the Secretary is to the concept of making public waterfront activities both physically available and psychologically accessible.

Evaluation

Having reviewed the DEIR according to the "yardstick" set forth in the foregoing discussions, we have several observations to make concerning its adequacy in the domain of urban design. To begin with, one cannot help but take note of the fact that -- by the proponents own admission -- the alternative master plans for the combined developments are virtually indistinguishable in terms of overall massing, general locus of uses (including street layout), and other basic design features such as the placement of parking underground and the excavation of a canal between the marina and Fort Point Channel.

To be sure, there are important differences between the Lesser Scale Alternative (LSA) and the Initial Master Plan (IMP) for each of the respective project components. The Fan Pier LSA offers new pedestrian bridges across the canal, lower buildings on the newly-created island, and more distinct "stepbacks" along Northern Avenue; likewise, the Pier 4 LSA provides more openness and access at the pedestrian level together with more sunlight at the common area on the marina's edge. But these changes do not represent departures from basic organizing principles, nor even can they be called legitimate sub-alternatives; instead, they fall into the category of refinements to an otherwise invariant conceptual design.

Admittedly, this fine-tuning came about as the result of extensive interraction with public advisory groups, a process whose openness was most commendable and which produced a master plan with many attractive and sensitive features. But the fact remains that what the DEIR puts forward as "alternatives", i.e. an earlier and a later version of the same development scheme, are not options in any meaningful sense of the word. In no manner do the IMP's highlight tradeoffs or serve to frame issues of choice; they simply make the LSA's look good by comparison (as well as demonstrate the proponent's willingness to make incremental changes in response to good advice).

The extent to which this state of affairs is compromising to the MEPA process depends, of course, on how faithfully the proposed action (nee the Lesser Scale Alternative) comports with the spirit as well as the letter of the scope. On one hand, the proponents quite obviously have embraced public utilization of both the Fan Piers and the Pier 4 sites as a valid

objective of development. The collection of outdoor and indoor amenities for pedestrians, as well as the array of proposed and potential water-transportation facilities, is impressive and worthy of considerable praise. On the other hand, we are uncomfortable with several aspects of the Lesser Scale Alternative as it deals with the issues of physical availability and (particularly) psychological accessibility of a "public" waterfront. More specifically, our concerns fall into three basic categories: configuration of public facilties; wind/shadow impacts; and the visual experience. Each category is discussed separately below.

1. Concerns About the Configuration of Public Facilities

In this category there are three matters of concern. First, it is somewhat disconcerting to find that the proponents attitude toward linking the Harborwalk with the downtown pedestrian network (i.e. across Fort Point Channel) is one of benign neglect. The DEIR refers to the possibility that the city will keep the old Northern Avenue Bridge as a link to the Fan Pier site, but it is silent as to what the proponents themselves might do to establish such a link in the event the bridge is not available for this purpose. Insofar as the vitality of the Harborwalk and park area may depend to a significant degree on the existence of a pedestrian flow from downtown, we strongly urge the development of a mitigation plan on this issue.

Second, we find it curious that nearly all of the boat-related activities envisioned for this site are concentrated in the lagoon area, leaving the extensive Fan Pier bulkhead (in good condition and in a prime

location) unused as a berthing area for vessels of any kind. Considering the suitability of the bulkhead for more active use, as well as the possibility of congestion in the marina area, we urge that the FEIR give serious consideration to a redistribution of water transportation facilities along the shoreline. In addition, the proponents should explore the possibility of relocating a substantial portion of the marina itself, which is essentially a private facility insofar as only a nominal 10% of the slips will be available for transient use. In its place, we suggest more extensive public use in the form of dingy's, paddle-boats, ocean kayaks and other non-motorized vehicles of relatively small-scale. This mix of use, in our estimation, would greatly contribute to the lagoon's "destination value" and reinforce the public character of the surrounding area (walkways, Pier 4 plaza etc.). The Charles River has its crew shells, the Public Garden has its swanboats, and we feel this unique lagoon area also deserves to be known as a place where people can actually get out onto the water at little or no cost.

We also think the Fan Piers site would be an excellent place to enhance public awareness of the Harbor by providing an observation facility at the top of one of the high rise buildings in the proposed project. Incorporating such a facility into the hotel, for example, would not only afford the public a panoramic view of the Inner Harbor and Boston's newly-revitalized waterfront; it might also result in less opposition to the hotel as a violation of the Harborpark height guidelines. We concede that devoting an entire floor to an observation facility (as per the

Prudential building) may not be the most cost-effective design strategy, but there are undoubtedly other options open to the creative architectural mind. We urge, therefore, a study of such options in connection with the FEIR.

2. Concerns About Shadows and Wind

The analysis of shadow and wind impacts in the DEIR presents, in our opinion, an example of how the failure to evaluate real alternatives can tend to obscure important design issues. In the case of shadows, the proponents conclude that for both developments the LSA designs "minimize self-shading of the proposed public open spaces". This statement is true in a strict relative sense, i.e. based on comparison to the IMP design, but one must also bear in mind that the LSA and IMP are so similar in overall massing and building alignment that -- as the proponents admit -- "development-related shadows will not differ substantially" between the two master plans. Thus the real issue, on which the DEIR is conspicuously silent, is how severe the shadow impacts of the LSA are expected to be in an absolute sense.

To address this issue in a preliminary way, we have found it useful to analyze the information presented in the DEIR in a qualitative fashion, using the tabular format displayed in Figure One. There, the conditions at eight major open space locations are listed for three times during the day on March 21, the day which shows the average shadow condition to be expected during the majority of the year. The resulting matrix comprises some 24 place/time combinations, or "cells", and inspection of that matrix yields the following observations for the typical day:

Time of Day / Location	Morning (9 A.M.)	Midday (12 A.M.)	Afternoon (3 P.M.)
Fan Piers			
canal, south promenade	shade	mostly shade	mostly shade
canal, north promenade	sun	mostly shade	mostly shade
waterfront park	mixed	mixed	shade
Harborwalk	mixed	mixed	mixed
plaza	shade	sun	shade
ampitheater	shade	sun	shade
Pier 4			
plaza	mixed	mostly sun	mixed
Harborwalk	mixed	mixed	mixed

FIGURE ONE: AVERAGE SHADOW CONDITIONS EXPECTED DURING MAJORITY OF YEAR ON PUBLIC OPEN SPACE

* 10 of 24 "cells" (>40%) are all or mostly shadowed, and another 10 of 24 are partly in sun and partly in shadow, leaving only 4 cells (<20%) all or mostly in the sun;

* of the 8 key public spaces, only 4 are wholly bathed in sunlight at any point in the day, and in each case this sunny condition exists at only one point in the day;

* in the morning, only one of 8 key public areas (the canal's northern walkway) is all or mostly sunny; at noon only 3 of 8 are all or mostly sunny; in the late afternoon, not a single area is without substantial shadows.

The DEIR further indicates that on the most favorable day of the year (June 21), the number of sunny or mostly sunny cells is still in the minority; and that on the least favorable day (December 21), sunlight is limited to sporadic small patches nearly everywhere on the site. All things considered, we would venture to say tentatively what the DEIR did not -- that the proposed master plan seems likely to produce an unsatisfactory self-darkening of the combined Fan Piers/Pier 4 site.

Our assessment of the wind situation follows a roughly parallel course. In this case, DEIR data (Table V.3-1) have been grouped according to three basic regions (Harborwalk perimeter, Northern Avenue perimeter, and interior locations) and then disaggregated according to the three Melbourne "comfort categories" of interest. The results are displayed in Figure Two and can be summarized as follows:

* not a single spot on either site is judged to be comfortable for long periods of standing or sitting, and an overwhelming majority of locations (25 of 31) are judged to be uncomfortable for even short periods of sitting or standing;

* there are four sites that will not even be comfortable for walking; of these, three are in key public open spaces near the water one each along the Harborwalk, the canal, and the lagoon;

* the general pattern of "comfortable only for walking" is basically the same for all regions; the Northern Avenue

Discomfort Level / Region	Uncomfortable for walking or any periods of sitting/standing (Melbourne Category ≤2)	Uncomfortable for any periods of sitting/ standing (Melbourne Category ≤3).	Uncomfortable for long periods of sitting/standing (Melbourne Category ≤4)
Harborwalk (9 sites)	1 (No. 18)	8 (Nos. 2, 8, 15 18, 19, 24, 30, 31)	9 (Nos. 3, 8, 12, 15, 18, 19, 24, 30, 31)
Northern Ave. (11 sites)	1 (No. 20)	8 (Nos. 1, 5, 6, 10, 16, 20, 21, 28, 29)	11 (Nos. 1, 4, 5, 6, 10, 14, 16, 20, 21, 28, 29)
Interior Locations (11 sites)	2 (Nos. 2, 23)	9 (Nos. 2, 9, 11, 17, 22, 23, 25, 26, 27)	11 (Nos. 2, 7, 9, 11, 13, 17, 22, 23, 25 26, 27)
TOTAL	4	25	31

FIGURE TWO: TYPICAL WIND IMPACTS ACCORDING TO MELBOURNE COMFORT CATEGORIES

region is perhaps slightly less windy than the others, but those results may have been different had the model for the wind erosion test included buildings on the Cabot/Cabot/Forbes property across the street.

On the basis of these results, we do not understand how the proponent can claim that "overall wind conditons will remain comfortable according to Melbourne's criteria." To us it seems that only strollers, joggers, and the like will be able to enjoy the considerable public open spaces provided in the Fan Piers/Pier 4 development.

All this leads us to the conclusion that mitigation of shadow and wind impacts should be given high priority in the FEIR. This should go beyond routine measures like building stepbacks, tree plantings, and protective covers over walkways, as mentioned in the DEIR. Alternative alignments, footprints, and heights of buildings must also be explored in the vigorous manner envisioned in the original scope.

3. Concerns About the Visual Experience

Considering how strongly the scope emphasized the need to maximize views of the Harbor, we find the visual analysis presented in the DEIR to be perplexing at best. On the one hand, the proponents do a thorough job of demonstrating (Views B, C, D, G) that visual access to the Fort Point Channel and downtown would be well-preserved in either the IMP or the LSA (View I being the only exception). The same cannot be said, however, for views of the Harbor proper, both from Northern Avenue and from the public areas of the site itself. In fact, in the latter case there is simply

no information presented, leaving it open to speculation as to whether, say, an ampitheater 'shell' will obstruct harbor views from the Pittsburgh street oval in front of the hotel.

Equally distressing is the fact that the DEIR all but ignores the exhortation in the scope -- voiced in three separate places -- to make the water's edge as visually accessible as possible from Northern Avenue. View E shows, to begin with, that the off-site view corridors to the north are virtually filled with building masses lining Northern Avenue, which we think creates a significant 'walling' effect (despite the proponents assertion that a lower, pedestrian scale base element affords a "more sympathetic approach"). Making matters worse is the fact that of the five street corridors penetrating the site, only the two at either end seem to allow a clear view to the water. The view down the cul-de-sac next to Pittsburgh is blocked by the hotel complex. And the views down Farnsworth and Pittsburgh -- the principal gateways to the complex -- are blocked first by the bridges rising above the canal, and then by the ten-foot rise in elevation occasioned by the underground parking to the north of the canal. It seems reasonable to presume, by the way, that this ten foot "berm" cuts off the view to the Harbor from the promenades along the canal as well.

Another, more subtle concern we have about the visual experience on the Fan Piers site concerns what appears to be a high degree of stratification in the placement of buildings. Those devoted to private residential use are clustered in the triangular sector of the island,

whereas those devoted to more "public" structures (offices, retail stores, hotel complex) are aligned with the southeastern and southwestern borders of the site. This separateness is accentuated physically by the canal and the oval turn-around area in front of the hotel; and perceptually by the fact that condominium complexes are relatively subdued areas during weekday daylight hours. We wonder if all this will be inimical to the goal of making the adjacent Harborwalk and park an inviting activity center for the public, especially since those facilities are already visually disconnected from Northern Avenue, not linked to the downtown pedestrian network, and subject to relatively inhospitable wind and shadow conditions. [By way of contrast, both the IMP and the LSA for Pier 4 exhibit considerable integration of uses, both within individual buildings and among adjacent structures. Thus the possibility that any public open spaces might become relatively "dead" areas seems quite remote].

Concluding Remarks

It should be abundantly clear by now that we have several, interrelated misgivings about the efficacy of developing the Fan Piers/Pier 4 site according to the master plan known as the Lesser Scale Alternative. These misgivings are rooted in an abiding concern that in transforming this one-of-a-kind waterfront area into a new cityscape, its great potential to serve as a vital, unifying link between Bostonians and Boston Harbor might not be realized in full. As coastal managers it distresses us to think that the bounty of any urban harbor -- in this case, a resource to which the city historically owes its very existence -- might be sacrificed inadvertently at the altar of urban scale.

We stress the word inadvertently, by the way, because CZM is certain that the proponents are no less committed than we to the goals of creating both a successful business/residential district and a successful public waterfront district. The problem, we realize, is that such goals are not mutually exclusive, especially in the instant case where site-specific geographic factors make the waterfront intrinsically susceptible to adverse wind and shadow conditions and difficult to integrate with the downtown segment of Harborpark. But to say that some tradeoffs must be made is not to say that the planning function is ultimately a zero-sum proposition. Rather, it indicates that extra-ordinary effort must be made first to understand what conflicts can be resolved through innovative design, and then to highlight the remaining choices so informed decisions can be made. Such an effort, in our considered judgement, is not sufficiently manifest in Chapter V of the Fan Piers/Piers 4 DEIR.

In essence, what we are saying is that the job of master planning for this project -- especially for the Fan Piers component -- should not be considered finished. A good deal more creative energy should be expended on behalf of the concerns we have expressed regarding physical availability and psychological accessibility, and in response to the suggestions we (and others) have made as to alternative design elements. Some of these concerns may well turn out to be unfounded, and there may be good reason not to follow some of the suggestions made. But that is beside the point, because our advocacy is not directed toward acceptance of particular changes in specific project components, but toward the need for a

continuing search for a superior master plan in general. And that search must not be one that starts with a long list of "givens" and proceeds to fine-tune the project as it now stands. Some of the basic organizing principles must also be called into question in order to make the FEIR a more meaningful document than we have found the DEIR to be.

For example, if the issue of off-site visual accessibility is to be engaged constructively, it may be necessary to reconsider the proposal to put all parking underground. We appreciate that the motivation was to avoid using prime waterfront acreage for storing automobiles, but in fact their placement underground still results in an intrusion by virtue of the 10-foot rise in elevation created on the Fan Pier island. To eliminate this intrusion, parking would either have to be put farther underground, or relocated in part to the surface. To the extent the latter alternative may result in lower costs, it might also allow for a reduction in density required to capture infrastructure costs. At any rate, we think the options shoud be explored and the issues of choice clarified.

Another project feature that seems deserving of re-evaluation is the canal. It cannot be denied that the canal and associated promenades would probably come to be known as the design signature of the project, insofar as they would add a special sense of place as well as facilitate water-based activity. On the other hand, there is something incongruous about introducing an additional water element to a site already so well-endowed with Harbor frontage, especially if the result in any way serves to shunt public activity away from the natural waterfront. That may or may not happen, but what one can be reasonably assured of is that the canal will also:

* cost $12 million, which could be spent on other public amenities such as additional water transportation services or on innovative schemes to move people across the Fort Point Channel and onto the Harborwalk;

* occupy some 18 percent of the project site, which not only forces a higher density on the remaining surface area, but also prevents substantial realignment of buildings along Northern Avenue to open view corridors and mitigate wind/shadow impacts;

* occupy a significant land mass, which reduces the volume available for the underground parking facility (thus contributing indirectly to the berm on the island);

* create a need for bridges, which in turn result in obstructed views toward the harbor from points south of the canal;

* create an "island effect" which accentrates the sense of segregation from the residential buildings already created by the fact that they are clustered together atop a ten-foot berm.

In short, it seems to us that the canal carries with it a very high "opportunity cost" in terms of design flexibility -- flexibility, which is badly needed given climatological constraints and density objectives for the site. For this reason, we think the proponents should use the FEIR to take another long, hard look at the canal.

Admittedly, what we are calling into question here are some of the basic premises upon which the project is founded, and we are suggesting that it would be worthwhile for the proponents to "go back to the drawing boards" to a certain extent. We hope this suggestion will be taken in the constructive spirit in which it is offered, because on the whole we applaud both the substance and the style of the proponents' work on this most ambitious project. And as a closing thought, we hope they will consider this: we have not said, as others have, that the project is too "up-scale"

in terms of either the mass of the buildings or the income of those who will occupy them. But we do feel strongly that while the structures can be imposing, they should not be taken to be an imposition on the spaces people occupy; and while the area can be exclusive, it should not be seen as exclusionary to ordinary people whose presence would serve, as one columnist put it recently, "to leaven the island of affluence." The way to do this is not to make incremental reductions in building height or shape, or to provide nominal amounts of internally-subsidized housing. What is needed is a concerted effort to ensure that the area comes to be known as the epitome of a public waterfront district, a place where people feel, in the words of another commentator, "that they are at the center of spaces that the buildings shape and enliven, but which the people, not the buildings, occupy". This, in our minds, is what public access is all about.

The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Quality Engineering
Division of Air Quality Control
One Winter Street, Boston 02108

S. RUSSELL SYLVA
Commissioner

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M E M O R A N D U M

TO: EOEA

ATTN: Steve C. Davis, MEPA Unit

FROM: Michael J. Maher, Air Quality Section Chief

DATE: January 24, 1986

SUBJECT: EOEA #4426/4584 - Fan Pier/Pier 4 Development Project Boston, Review of the Draft Environmental Impact Report

This office has received the Draft Environmental Report (DEIR) prepared for the above referenced project. Based upon a review by DAQC staff, we offer the following comments:

1. The Final should include documentation of all modeling methodology used in determining carbon monoxide concentrations at proposed intersections, including Caline 3 worksheets, inputs and a sample Mobile 3 run.

2. Section 1V, p 1-11 states "Levels of Service 'A' through 'D' are generally considered acceptable". Levels of Service 'A' through 'C' is the acceptable range. The Final should include analysis of applicable intersections in the event any were omitted due to this error.

3. The proposed recommendation of adding a third westbound lane for New Northern Avenue to minimize air quality impacts at the intersection of New Northern Avenue and Seaport Access Road contradicts the mitigation measure prepared for New Northern Avenue and Sleeper Street. This difference should be clarified in the Final.

4. The 1-hour and 8-hour CO concentrations shown in Table 2-9 in Section IV. 2-26 appear to be an error since the concentrations presented are below established backround concentrations. The Final should address this apparent discrepancy.

5. The Final should include the net difference in number of commercial and non-commercial parking spaces displaced by the project and added by the project.

Should you have any questions regarding this memorandum, please contact Jerome Grafe at 292-5703.

JG:dep

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